EIP ASSOCIATES

PROPOSED
CAJON
PIPELINE
PROJECT

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PIPELINE
CO., LTD.

PREPARED FOR
BUREAU OF
LAND
MANAGEMENT
AND
THE CITY OF
ADELANTO

JUNE,
1993

SCH# 91082007

CAJON

FINAL

ENVIRONMENTAL IMPACT REPORT/STATEMENT

Response to Comments
Volume II

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TABLE OF CONTENTS

Volume II Response to Comments

List of Tables

1.0 Introduction

1. INTRODUCTION

1.1 PURPOSE AND CONTEXT OF THIS REPORT

This Responses to Comments document, together with the Draft EIS/EIR and its Technical Appendices, constitutes the Final EIS for the Cajon Pipeline project. The Draft EIR/EIS was circulated for public review from November 20, 1992 to January 5, 1993. This review period was extended to January 31 in response to comments by the public. The Draft EIS/EIR included a description of the proposed project, project alternative, and an assessment of the potential effects associated with the implementation of the project alternatives to the project and a description of proposed mitigation measures to avoid or reduce such effects.

The U.S. Bureau of Land Management (BLM) is the Lead Agency for the National Environmental Policy Act and the City of Adelanto is the Lead Agency for the California Environmental Quality Act. The Final EIS/EIR for the Cajon Pipeline project is compiled and published to inform the public and agencies of the final project, including revisions which have been made pursuant to comments on the Draft EIS/EIR.

1.2 HOW TO USE THIS REPORT

This report is divided into six sections: Introduction, Errata, Mitigation Monitoring Program, Written Comments and Responses, Verbal Testimony Transcripts and Responses, and Acronyms and Abbreviations.

The Introduction (Chapter 1) notes the purposes and content of the Final EIR, the environmental process, and how to use this report.

The Errata section (Chapter 2) lists the changes which have been made to the Draft EIS/EIR and notes the pages of revisions within the Final EIS/EIR.

The Mitigation Monitoring Program (Chapter 3) for the Cajon Pipeline project has been prepared in compliance with Section 21081.6 of the California Public Resources Code (also known as AB 3180, Statutes of 1988). This section lists in the form of a Summary Table all of the potential impacts of the program and alternatives and the proposed mitigation measures to reduce or eliminate identified impacts. This Summary Table also describes the responsible departments or agencies for the monitoring program, mitigation monitoring procedures, and reporting procedures.

The Responses to Comments section (Chapter 4) includes a chronological listing of all comments received from agencies, individuals and groups who submitted written comments to BLM on the Draft EIR/EIR. Beside each letter are the responses to comments bracketed in the submittals. Comments were received from federal, state, regional, and local governmental agencies and other organizations.

The Verbal Testimony Transcripts and Responses (Chapter 5) includes a summary of comments received at public hearings held on December 1, 2 and 3, 1992, and responses to verbal comments.

The Acronyms and Abbreviations (Chapter 6) utilized within this volume are listed for reference.

Errata

2.0

2. ERRATA

Pursuant to comments received on the Draft EIS/EIR for the Cajon Pipeline Project, revisions have been made to the text of the Draft EIS/EIR in order that it constitute the Final EIS/EIR for the proposed project. These revisions include additions of text for clarification, corrections to text within the Draft which may have been incorrect, and corrections to figures. Corrections which have affected the substantive content and issues of the document have been listed below. The specific text is not produced here in full but is provided for reference so that the reader may easily identify the revisions which have occurred in the document. These corrections are listed in order of section with reference page number within the Final EIS/EIR. Mitigation measures are referenced by the mitigation measure number as shown in Table 2-1.

Page	Correction
1-7	The following permits have been added to Table 1-2: Encroachment permit, State Lands Commissions. The operator of the California Aqueduct has been corrected as the Department of Water Resources.
2-1 through 2-61	Table 2-1 has been revised per comments received by the public and review by the BLM. These corrections are consistent with corrections made to mitigation measures proposed in Chapter 5 and are also consistent with the mitigation measures presented in the Mitigation Monitoring Program. The following is a summary of the substantial changes and additions: ■ Revegetation and emergency response mitigations monitored by ad hoc review committees (5.1.1-4) ■ Greater detail is now provided in implementation description of the following mitigation measure: 5.1.1-3, 5.3.1-4(a), 5.3.1-6(a), and 5.3.1-8. ■ Analysis and further recommendations for contaminated soil due to existing sites and due to construction (5.1.1-5 and 5.3.1-2(b)) ■ Additional requirements placed on fill used (5.1.1-6(d)) ■ Mitigation for interference with abandoned wells (5.1.1-7) ■ 1601 consultation requirements (5.2.1-1(b)) ■ NPDES requirements (5.2.1-1) ■ Coordination with City of Pomona in construction along City bridges (5.2.1-5(e)) ■ Requirements for dust control measures (5.4.1-1(a))

- Public notification signs for construction timing (5.5.1-2(b))
- Revision of vegetation relocation requirements (5.6.1-2(b))
- Constraints on width of graded swaths in hillside areas (5.6.1-4(a)(b))
- Revegetation following decommissioning (5.7.1-4(d))
- Measures to mitigate utilities coordination, notification and disruption (5.8.1-1)
- Coordination with transit agencies (5.10.1-1(f))

3.-1 through 3-47	Additional information has been added to the Project Description to clarify points raised during the public review period. Information added includes: a description of upstream and downstream facilities and procedures for abandonment of the pipeline. The pipeline route has been revised at two locations - Adelanto and Carson.
3-8	Figure 3-3 (ROW Markers) has been added to illustrate the ROW markers.
3-9	The legend of Figure 3-2 (Longitudinal Profile) has been revised.
3-33	Figure 3-12 (Schedule) has been updated to reflect current environmental permitting dates.
3-42	Figure 3-16 (Pacific Pipeline) has been revised.
4.1 & 5.1	The Geology section incorporates review of the Cortese List and potential locations of contaminated soils along the pipeline right-of-way.
4.4 & 5.4	The Air Quality section has been revised to incorporate an air toxics analysis. The original calculations of air emissions have been revised to incorporate consistent construction rates.
6.5	Table 6-1 has been revised.
10-1	Abbreviation table has been updated.

3.0

Mitigation Monitoring Program

3. MITIGATION MONITORING PROGRAM

3.1 INTRODUCTION

The Draft EIS/EIR evaluated the impacts of constructing and operating the Cajon Pipeline project. As discussed in Chapter 4, during the public review of the Draft EIS/EIR, agencies and the general public expressed concerns regarding revegetation, system safety, location relative to an elementary school and mitigation monitoring. In response to these concerns, the BLM and Cajon has modified the proposed project and mitigation measures which would be imposed.

The California Environmental Quality Act (CEQA) requires all public agencies to establish monitoring or reporting procedures for mitigation measures adopted as conditions of approval, in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program must be designed to ensure compliance during project implementation (Public Resources Code Section 21081.6).

The mitigation measures that will be monitored for the proposed project consist primarily of those that have been adopted to reduce or avoid significant impacts. In some cases, the Draft EIS/EIR has identified additional mitigation measures that would further reduce the effect of less-than-significant impacts. These measures are also listed in the Mitigation Monitoring Program (MMP).

3.2 AUTHORITIES

The authority of the BLM is delineated within the 43 CFR Ch. 11 § 2883. Prior to the beginning of pipeline operations, the ROW holder must submit to an authorized officer a certification of construction, verifying that the pipeline system has been constructed and tested in accordance with the terms of the ROW grant, and in compliance with any required plans and specifications, and applicable Federal and State laws and regulations. The requirements and specifications delineated in the MMP become part of the conditions of the ROW grant and as such as are enforceable by the BLM. If it is determined that any activity being conducted or authorized by the ROW holder is endangering public health, safety or the environment, then the BLM may order immediate suspension of that activity and specify immediate remedial action. If the BLM determines that the ROW holder has failed to comply with any term, condition or stipulation of the ROW grant or applicable laws or regulations, then the BLM may institute procedures for suspension or termination of the ROW grant.

3.3 MONITORING AND REPORTING PROCEDURES

The MMP delineates responsibilities for monitoring projects, but allows the BLM and City of Adelanto flexibility and discretion in determining how best to monitor implementation. Monitoring procedures will vary according to the type of mitigation measure. The timing for monitoring and reporting is defined in the following Mitigation Monitoring Program (Table 3-1). Establishing adequate monitoring procedures generally consists of demonstrating that monitoring procedures took place and that mitigation measures within the BLM, USFS and City of Adelanto's discretion and jurisdiction were implemented.

Reporting consists of establishing a record that a mitigation measure is being implemented. In this instance a number of different jurisdictions will be involved in ensuring that mitigation is being implemented effectively and that it is achieving the stated objective. A number of mitigation are outside the jurisdiction of the BLM. In these instances, monitoring reports shall be submitted to the BLM, which will act as a "clearinghouse" for monitoring and compliance.

Two review committees have been established in response to the public and agency concerns. The Erosion and Sediment Control Review Committee was established to review the effectiveness of implementation of revegetation and the Emergency Response Review Committee was established to review plans for emergency access and public safety. These two committees will review the respective administrative final copies of the proposed plans and provide recommendations to the lead agencies for implementation of each plan. Following implementation the Erosion and Sediment Control Review Committee will meet three times following construction - once to confirm compliance with the revegetation plan, six-months following construction to ensure effectiveness and to propose remediation action if required and finally 18 to 24 months following commissioning to ensure progress of revegetation. At this time, the committee shall review the ongoing progress of revegetation and make final recommendations for continuance of the program. The committee shall then be disbanded. Their duties of oversight and review shall be undertaken by the BLM in normal monitoring operations.

All monitoring progress reports, summaries, data sheets and correction instructions related to the Cajon Pipeline project will be available for public review upon request at the BLM. Any questions regarding availability should be directed to the BLM.

3.4 SUMMARIZED MITIGATION MONITORING PROGRAM

The MMP (Table 3-1) outlines the mitigation measures which will be stipulated within the ROW grant, the implementation timing of each measure, the action required to monitor the mitigation implements, the frequency of monitoring, and the responsible agency for monitoring.

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
1. Geology								
1-1	**The pipeline route would cross active traces of the San Andreas and San Jacinto faults, and may cross the potentially active or buried segments of the Cucamonga, Whittier, and Newport-Inglewood faults.**	1-1(a)	Additional studies shall be performed during the geotechnical investigation for the design of the proposed pipeline to identify the locations and width of the fault crossings. This data would be verified during excavation for the pipeline by an engineering geologist. Any deviations from the previously identified locations and width of the fault crossing would be incorporated into the fault crossing design.	Prior to construction	Submission of COM Plan	Completion of design	BLM	Engineering specifications as part of the COM Plan
		1-1(b)	*At locations of fault crossings special design details shall be incorporated into pipeline design to mitigate the anticipated lateral displacements associated with fault rupture. The fault crossing design may comprise crossing the faults at an angle that allows ductile steel pipe to deform without rupturing. This typically requires crossing the fault at an angle of 60 to 85 degrees in the direction that will place the pipe in tension during faulting, rather than in compression.* *The pipe shall then be placed in a V-cut trench with sidewalls inclined as flat as 1.5:1 and backfilled with low shear strength material. Alternatively, fault crossing solutions could include crossing the fault on the ground surface or placing the pipeline in a large pipe that could absorb the anticipated fault displacement without impacting the oil pipeline. Seismic joints should be constructed in the annular space*	Prior to construction	Submission of COM Plan	Completion of design	BLM	Engineering specifications as part of the COM Plan

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
			between the two pipes to provide support during static operating conditions. These joints should absorb fault movement by separating or crushing. These design details shall be undertaken by a registered civil engineer and approved by the BLM.					
		1-1(c)	*Remotely operated automatic block valves shall be located at either side of active fault crossings, as shown in Table 3-1 of the Final EIS/EIR.*	Prior to construction	Submission of COM Plan	Completion of design review	BLM	Engineering specifications as part of the COM Plan
		1-1(d)	*An Oil Spill Contingency Plan approved by Lead Agencies shall include emergency plans for rupture of the pipeline at fault crossings and controlled shutdown of the pipeline in the event of a rupture. This plan shall be reviewed by the Emergency Response Review Committee. The committee shall provide recommendations to the Lead Agencies for implementation of the plan. This plan shall be finalized and approved by the Lead Agencies (BLM, USFS and the City of Adelanto)*	Prior to operations	Submission of OSC Plan	Completion of plan review	BLM	Specifications to be included as part of OSC Plan
1-2	**The pipeline route would encounter areas of steep slope with potential instability and restoration problems.**	1-2(a)	*To avoid slope instabilities and increased erosion, directional drilling construction techniques shall be utilized on the CalNev slope (M.P. 59). The project proponent shall pursue an alternative alignment at M.P. 74 to avoid steep slopes. This alternative alignment has been identified as Sycamore South Segment Alternative in this document and shall be approved and/or rejected by the Lead Agencies (BLM, USFS, and the City of Adelanto).*	Not applicable				Alternative alignment incorporated into proposed action.

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
		1-2(b)	*The revegetation actions within the Erosion and Sediment Control Element of the COM Plan shall include slope stabilization measures where necessary to the satisfaction of the Erosion and Sediment Control Review Committee.*	Prior to construction	Submission of COM Plan	Completion of design review	BLM	
1-3	**The pipeline route crosses areas susceptible to liquefaction.**	1-3	The pipeline route between M.P. 62 and M.P. 85 and M.P. 120 and M.P. 142 shall be reviewed to determine the location of the groundwater table, the characteristics of underlying soil and hence the most appropriate measure to reduce liquefaction potential or provide protection of the pipeline from soil liquefying. These measures may include - but would not be limited to: (a) use of stone/gravel columns to improve dissipation characteristics and increase density of soil where appropriate, or (b) concrete coating the pipeline to prevent pipe rising out of the ground.	Prior to construction	Submission of COM Plan	Completion of design review	BLM	Engineering specifications as part of COM Plan
1-4	**Pipeline construction would require excavation and stockpiling of soil and may result in soil erosion.**	1-4	*An Erosion and Sediment Control Element, a component of the COM Plan, shall be submitted to the BLM, USFS, and the City of Adelanto as specified in Mitigation Measures 1.1. This element shall be reviewed by the Erosion and Sediment Control Review Committee. The committee shall provide recommendations to the Lead Agencies for implementation of the element. This element shall be finalized and approved by the Lead*	Prior to construction	Submission of COM Plan	Completion of design review	BLM	Engineering specifications as part of COM Plan

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
			Agencies (BLM, USFS, and the City of Adelanto).					
1-5	**In urban areas of Los Angeles County, excavation of the pipeline may encounter contaminated soils.**	1-5(a)	*A detailed Phase I site assessment shall be undertaken following detailed engineering design to identify the exact locations and extent of contaminated soils previously identified and others which may potentially occur within the construction rights-of-way. These studies may comprise a review of EPA and other governmental agency's listings of contaminated soil sites.*	Prior to construction	Submission of report	On completion	BLM/DHS	
		1-5(b)	*Soils must be visually inspected as excavation occurs. If by visual inspection there is any evidence that contamination may be present, soil testing shall be undertaken at the identified location of contamination. No construction of the pipeline will occur within soil exhibiting evidence of contamination, until written approval from the regulatory agencies that have authority has been received.*	During construction	Inspection and report submission	On completion	BLM/DHS	
1-6	**An accidental pipeline leak or rupture would result in soil contamination and potential ground water contamination in areas of high ground water occurrence.**	1-6(a)	*Contaminated soils shall be excavated, treated, and disposed of at a registered landfill.*	Throughout project	Inspection and report submission	At discretion of regulator	BLM/DHS	
		1-6(b)	*An Oil Spill Contingency Plan shall be developed which would include procedures for removal of contaminated soils and containment procedures in areas of high groundwater, and revegetation and restoration of damaged areas. This plan shall be*	Prior to operation	Submission of COM Plan	Completion of design review	BLM	

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
			reviewed by the Emergency Response Review Committee. The committee shall provide recommendations to the Lead Agencies for implementation of the plan. This plan shall be finalized and approved by the Lead Agencies (BLM, USFS and the City of Adelanto) Revegetation and restoration shall be in accordance with the Erosion and Sediment Control Element of the COM Plan and shall be reviewed by the Erosion and Sediment Control Review Committee.					
		1-6(c)	*Implementation of Mitigation Measure 1-1(c).*	Not applicable				Refer to 1-1(c).
		1-6(d)	*Soil that is to be used as fill must be clean, similar to surrounding soils, capable of supporting the existing vegetation and consistent with the requirements for fill as outlined within the Erosion and Sediment Control Element of the COM Plan. This element shall be reviewed by the Erosion and Sediment Control Review Committee.*	Throughout project	Inspection	As required for maintenance procedures	BLM	Maintenance requirement
1-7	The pipeline route may interfere with plugged and abandoned active and inactive oil wells.	1-7(a)	*Prior to commencing construction, the Cajon Pipeline company shall consult with the Department of Conservation Division of Oil and Gas (DOG) for information on wells located within the pipeline right of way.*	Prior to construction	Consultation	On completion	BLM	
		1-7(b)	*If the pipeline is located over or in the proximity (that is within the ROW or within 20 feet of the ROW) of a plugged and abandoned well, then coordination shall be undertaken with the DOG to ensure that the well is correctly*	Prior to construction	Inspection	On completion	DOG	

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
			abandoned and does not require reabandonment.					
2. Onshore Water Resources								
2-1	**Construction of the proposed pipeline from M.P. 0 to M.P. 80 and at stream crossings could result in high rates of erosion and generation of sediment load which could impact water quality.**	2-1(a)	*Construction activities shall be scheduled for the dry season. If stream conditions are such that the channel contains some surface flow, cofferdams or other construction techniques shall be utilized subject to the approval of the Lead and Agencies (BLM, USFS, and the City of Adelanto). Public lands (both USFS and BLM lands) will only be used with prior approval of and under the direct supervision of the BLM or Forest Service, to minimize the amount of suspended sediments resulting from trenching activities. Downstream detention basins, sedimentation traps, evaporation ponds, etc., shall also be installed.*	Construction period	Inspection	Periodically	BLM	
		2-1(b)	*The Cajon Pipeline Company shall be advised to seek early consultation with the Department of Fish and Game (CDFG) to obtain a Streambed Alteration Agreement under Section 1601 for construction activities across the following streams and washes - Fremont Wash, Crowder Canyon, Cleghorn Canyon, Cajon Creek, Sycamore Canyon, and Lytle Creek. Under this agreement any Mitigation Measures if any would be decided at the time of consultation.*	Prior to construction	Consultation	At discretion of regulator	CDFG	
		2-1(c)	*At stream crossings, the disturbance of the streambed and banks required for construction equipment shall be kept to*	During construction	Inspection	Periodically	BLM	

TABLE 3-1
MITIGATION MONITORING PROGRAM

Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
		a minimum, but in no cases greater than 100 feet by 250 feet.					
	2-1(d)	*An Erosion and Sediment Control Element shall, as part of the COM Plan, shall be submitted to the appropriate governmental agencies for approval by the project proponent prior to grading. The Erosion and Sediment Control Element shall be reviewed by the Erosion and Sediment Control Review Committee for any further comments prior to implementation. This plan shall include, but is not limited to, the following erosion control methods.*	Prior to construction	COM Plan	Completion of design review	BLM	
	(i)	*Topsoil (at least the top 6" of soil) would be removed and segregated from the ditch spoils, and would be replaced as topsoil upon completion of construction.*	During construction	Inspection	Periodically	BLM	
	(ii)	*During construction, interceptor ditches or drainage swales shall be used to intercept storm runoff to prevent sediment from leaving a disturbed area or entering adjacent streams. In addition, temporary mulching, seeding, or other suitable stabilization measures shall be used to protect exposed areas.*	During construction	Inspection	Periodically	BLM	
	(iii)	*Excess soil from construction on National Forest lands shall be placed on Forest roads, under the direction of the Forest Service. Excess soil from construction on BLM lands shall be either disposed at a registered landfill or placed on public roads within BLM lands, under the direction of BLM.*	During construction	Inspection	Periodically	BLM/USFS	

TABLE 3-1
MITIGATION MONITORING PROGRAM

Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
	(iv)	*Revegetation methods shall include discing and drilling on the contour (with broadcast seeding of a native species mix), fertilizing, water barring, tree spading of mature species along the ROW into the disturbed areas, and scattering of previously cleared brush throughout cleared/disturbed areas. Revegetation methods shall be reviewed by the Erosion and Sediment Control Review Committee. Recommendations on the plan shall be made to the Lead Agencies (BLM, USFS, and the City of Adelanto).*	Following construction	Inspection	Periodically	BLM/USFS	
	(v)	*Illegal vehicle entry into revegetated areas on National Forest lands shall be precluded by: a) stockpiling all vegetation and boulders removed during construction, and randomly scattering them throughout the disturbed areas after revegetation, concentrating some in areas of easiest illegal access; b) screening of the ROW in areas of easy illegal access by using a tree spade to plant mature species from nearby areas; c) barricading some areas of easy illegal access to the satisfaction of the Forest Service; d) replacing roadside berms with larger than normal berms where the alignment crosses National Forest roads; and e) replacing any disturbed or breached fencing with the same quality or better fencing. Where the route enters Forest land from the north in Baldy Mesa, a large steel lattice work, approved by the Forest Service, sufficient to preclude OHV passage and set in concrete, will be erected, anchored into the*	Following construction	Inspection	Periodically	USFS	

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
			downslope on the west edge and running east to Baldy Mesa Road proper.					
		(vi)	*The CalNev slope in Cajon Pass shall be directionally drilled to avoid disturbance of surface soils.*	During construction	Inspection	At time of construction	BLM/USFS	
		(vii)	*Soil on graded slopes shall be revegetated in accordance with the Erosion and Sediment Control Element of the COM Plan and to the satisfaction of the Erosion and Sediment Control Review Committee as soon as possible following disruption.*	Following construction	Inspection	Periodically	BLM/USFS	
		2-1(e)	*A National Pollutant Discharge Elimination System (NPDES) permit shall be obtained from the RWQCB for grading of the pipeline right-of-way and construction at Cajon Terminal and the Adelanto Pump Station. Construction shall also comply with storm water quality management programs of the respective local agencies.*	Prior to construction	Permit	Periodically	RWQCB	
2-2	**Construction of the pipeline may interfere with operation of the Whittier Narrows Dam, Etiwanda Creek percolation basins, the Rio Hondo spreading basins, and the Dominguez Gap percolation ponds.**	2-2	*Prior to construction, the Cajon Pipeline Company proponent shall coordinate with the U.S. Army Corp of Engineers, the San Bernardino County Flood Control District, Metropolitan Water District, and the Los Angeles County Department of Public Works to determine location of existing facilities that may be affected by pipeline construction, and appropriate construction scheduling taking into consideration the operations of the Whittier Narrows Dam, Etiwanda Creek percolation ponds, the Rio Hondo*	Prior to construction	Consultation COM Plan	Completion of design review	BLM/COE/ SBCFCD/ MWD/ LACDPW	

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
			Spreading grounds and the Dominguez Gap percolation ponds.					
2-3	**Construction of the storage area and pumping facilities may result in an increase in stormwater runoff.**	2-3	*The storm drainage system for the Adelanto pump station shall be sized, designed and constructed in accordance with requirements of the City of Adelanto and consistent with the city's Master Drainage Plan.*	Prior to construction	COM Plan	Completion of design review	Adelanto	
2-4	**Hydrostatic testing of the pipeline would result in discharge of test water.**	2-4	*All test water shall be discharged at the GATX Carson Terminal in accordance with the terms of the terminal NPDES permits. No water shall be discharged on Forest Service lands.*	Prior to operations	Report	Periodically	RWQCB	
2-5	**A pipeline or pipeline tank leak or rupture could result in an oil spill and subsequent degradation of surface runoff by spilled crude oil.**	2-5(a)	*An Oil Spill Contingency Plan shall be developed which would include procedures for oil spill cleanup at river crossings. This plan shall be reviewed by the Emergency Response Review Committee. The committee shall provide recommendations to the Lead Agencies for implementation of the plan. This plan shall be finalized and approved by the Lead Agencies (BLM, USFS and the City of Adelanto)*	Prior to construction	Submission of COM Plan	Completion of design	BLM	
		2-5(b)	*Remotely operated automatic block valves will be located in the pipeline route along the Cajon Wash (M.P. 72) and Etiwanda Creek (M.P. 80), and as shown in Table 3-1.*	Prior to construction	Submission of COM Plan	Completion of design review	BLM	Engineering specifications as part of the COM Plan
		2-5(c)	*In those areas where the alignment will be in Old Cajon Boulevard, asphalt curbing shall be installed along all downslope edges of the pavement, to route and contain any product spills from ruptures. Any spill plans, or*	Prior to construction	Submission of COM Plan	Completion of design review	BLM	Engineering specifications as part of the COM Plan

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
			emergency response/repair plans, would have maps locating drainage structures leading from the pavement into Cajon Creek or its tributaries. Such plans will provide for the rapid closure/blocking/plugging of such structures.					
		2-5(d)	*Implementation of Mitigation Measures 12-1 to contain and reduce spills.*	Not applicable				Refer to 12-1.
		2-5(e)	*At M.P. 99.5 and 100.1 the Cajon Pipeline Company shall coordinate with the City of Pomona methods of reducing the risk of oil spill into the storm channels below these crossings. This may require rerouting so that the pipe can be bored beneath these channels, or inclusion of additional valves at these locations to reduce the linefill at each crossing. Additionally, if pipe is to be hung from the bridge support structure, engineering review shall be conducted to ensure engineering integrity and strength of each bridge.*	Consultation	Completion of design review	City of Pomona BLM		
2-6	**The pipeline could be exposed to scour and natural changes in the stream's channel morphology over its operational life.**	2-6	*Modeling of stream bed geometry shall be undertaken to determine the scour depth of the 100-year 24-hour runoff event for all major stream crossings. The pipeline burial depth shall be that scour depth plus six feet. The pipeline burial depth shall be checked annually at the following important crossings: Buckhorn Wash, Fremont Wash, Crowder Canyon, Cajon Creek and Lytle Creek. When the stream channel has degraded to the point where the pipeline is exposed or is buried less*	Prior to construction	Submission of COM Plan	Completion of design review	BLM	Engineering specifications of the COM Plan

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
			than four feet below the 100-year scour depth, the pipeline shall be reburied to the proper depth. A concrete blanket shall be required at Crowder and Cajon Canyon Wash crossings.					
3. Biological Resources								
3-1	**Construction activities could result in substrate removal, increased sedimentation, and habitat alteration for aquatic species, including the speckled dace, a federal candidate (category 2) and a species of special concern.**	3-1	*Construction areas for stream crossings shall be located outside the stream channel. In addition, the width of the construction right-of-way shall be minimized where ephemeral streams must be crossed, and no waste construction materials shall be discharged into any drainage areas, channels, or washes.*	During construction	Inspection	Weekly	BLM	
3-2	**Construction activities may result in a spill of fuel or lubricant used in the operation of construction equipment, which could damage aquatic or riparian habitat off site. In addition, many places where drainages are spanned by the pipeline, debris or toxic substances used in construction and welding could fall into the channel, cause local or downstream impacts either immediately or in the future.**	3-2(a)	*Fueling, lubrication and maintenance of construction equipment shall not be permitted within 500 feet of streams. Equipment shall be checked by Cajon Pipeline Company at least once a day for leakage, and leaking equipment shall be retired from use until repaired.*	During construction	Inspection	Weekly	BLM	
		3-2(b)	*Any soil contaminated by leakage of fuel or lubricants from construction vehicles shall be removed, treated, and dispersed of in a registered landfill. The ground surface shall then be restored to its pre-construction condition, including revegetation, consistent with the*					

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
			Erosion and Sediment Control Element of the COM Plan.					
3-3	**Pipeline construction will result in the removal of up to 630 acres of common native plant communities, not including staging areas, along the portion of the proposed pipeline than passes through non-urbanized or lightly urbanized habitats.**	3-3(a)	*The proponent shall design and implement site-specific revegetation plans according to the requirements and guidelines of the BLM, USFS, or landowner. these plans shall include the necessary topsoil replacement, seedbed preparation, mulching, fertilization, use of seed mixture containing native species, noxious weed control and additional erosion control. Generally, the revegetation objective is to return the disturbed area to a condition that would perpetuate previous land use. Guidelines established by the SCS shall be used where the pipeline would traverse private lands, and if agreeable to the owner. Periodic inspections of the ROW, but not less than annually, shall be conducted by the proponent and reclamation efforts enhanced where needed.*					
		3-3(b)	*A pre-construction meeting, to be attended by project management staff, site foremen, a qualified biologist, and biological monitor, shall be held. At this meeting, avoidance and minimization of vegetation impacts both within and outside of the ROW will be discussed to ensure that the construction management team are aware of sensitive areas and are areas to be avoided, and means of reducing impacts..*	Prior to construction	Consultation	Completion of consultation	BLM	

TABLE 3-1
MITIGATION MONITORING PROGRAM

Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
	3-3(c)	*Native species shall be used to revegetate areas disturbed by the project as described in the COM Plan (See Mitigation Measure 1-1(c).) Representatives of BLM and USFS shall be consulted for advice on, and approval of, the list of species and procedures to be used for revegetation of the different habitats to be affected.*	Prior to construction	Submission of COM Plan	Completion of design review	BLM	
	3-3(d)	*The proponent shall procure permits from the Agricultural Commissioner of the respective County and permission of the land owner prior to the removal of any cacti or Joshua Trees. Specimens up to 7 feet in height shall be relocated outside of the ROW by appropriate techniques.*	During construction	Permit	On completion	BLM	
	3-3(e)	*Spoil material from trenching and grading activities shall be salvaged. This will allow preservation of seedbank material in areas of natural vegetation, including stream and wash crossings. A double windrow method shall be used to separate topsoil from the remaining spoil material. Topsoil shall be bladed to the outside of the spoil pile. Replacement of spoil, then topsoil, will be achieved with an auger or other suitable equipment. The use of these types of equipment will reduce impacts to natural habitats in the spoil area of the construction zone.*	During construction	Inspection	Periodically (per distance of construction)	BLM	
	3-3(f)	*Sensitive plant communities as identified by the BLM and USFS which may include the macrophytic community or riparian communities shall be flagged and avoided during construction.*	Prior to construction	Inspection	Weekly	BLM	

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
		3-3(g)	*Use of the ROW in creosote and saltbush scrub shall be limited to crushing where topography allows, and when no fill or excavation is required. Disturbances for individual activities, such as lay-down, maintenance, etc., shall be located adjacent to each other within the ROW to minimize concentrated disturbances.*	During construction	Inspection	Weekly	BLM	
		3-3(h)	*A BLM field biologist or other qualified BLM personnel shall be present onsite during the initial ROW preparation to determine areas requiring minimal acceptable clearance procedures.*	Prior to construction	Inspection	Attendance	BLM	
		3-4(i)	*Joint inspection of the ROW by the proponent and the responsible or lead agency shall be conducted on federal lands to monitor the success and maintenance of erosion control measures and revegetation programs on federal lands for 5 growing seasons or for a period determined by the lead federal agency. This monitoring program would identify problem areas and corrective measures to ensure vegetation cover and erosion control. Certification of successful revegetation and erosion control will be determined by the lead federal agency.*					
3-4	**Construction of the Cajon Terminal would eliminate an estimated maximum of 20 acres (or much more area if impacts extended outside the ROW) of the soil crust microcommunity in which Mojave spineflower occurs.**	3-4(a)	*A map for the proposed staging area and turnarounds for the northernmost 25 miles of the pipeline route shall be submitted to the BLM for approval before construction is initiated to ensure that staging areas and turnarounds are within the ROW, the tank farm or existing roadways and*	Prior to construction	Submission of COM Plan	Completion of design review	BLM	

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
			cleared areas. The BLM will verify that only the working right-of-way, existing areas points and previously cleared areas will be utilized.					
		3-4(b)	*The limit of Cajon Terminal shall be fenced, and the boundary of the ROW staked and flagged. Construction and private vehicles shall not be driven outside these boundaries.*	During construction	Inspection	Periodically	BLM	
3-5	**Construction along the pipeline route will result in the death or displacement of common and sensitive wildlife species along the ROW.**	3-5(a)	*During construction where large quantities of brush is cleared, the slash shall be temporarily piled just outside of the ROW and then spread over the ROW to provide cover for displaced animals.*	During construction	Inspection	Weekly	BLM	
		3-5(b)	*For areas with moderate to high quality habitat, from M.P.0 to M.P.70, the length of construction spreads shall be less than 1,000 feet to allow wildlife to migrate to undisturbed areas.*	During construction	Inspection	Weekly	BLM	
		3-5(c)	*No construction shall occur within the Baldy Mesa area, especially on National Forest lands, from March 1 through July 15, to avoid impacts upon breeding Bell's sage sparrow.*	During construction	Inspection	Periodically	BLM	
		3-5(d)	*No construction shall occur on National Forests lands from SR-138 south to Sycamore Flats from January 1 through July 31 to avoid disturbing Golden Eagle breeding.*	During construction	Inspection	Periodically	BLM/USFS	
		3-5(e)	*No construction shall occur on National Forest lands from SR-138 south to the Glen Helen area, from 1 April through*	During construction	Inspection	Periodically	USFS	

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
			June 30, to avoid impacting Yellow Warbler breeding.					
		3-5(f)	*No construction shall occur in areas adjacent to riparian habitat (M.P.63.5) from April 1 through June 30 during the nesting period of the least Bell's vireo.*	During construction	Inspection	Periodically	USFS	
		3-5(g)	*To the extent feasible, open steep-walled ditches and holes shall not be left unattended for prolonged periods during construction, but shall be covered flush with the ground surface. Open pipe shall be capped and/or stored away from natural habitat areas. Animals trapped in holes or ditches shall be carefully removed or provided with a means of escape such as an inclined board or branch.*	During construction	Inspection	Daily	BLM	
3-6	**Pipeline construction could eliminate western spadefoot toad breeding areas, or could destroy individuals burrowed in the ground outside the breeding season.**	3-6(a)	*A survey for western spadefoot toad shall be carried out in suitable areas (Cajon Wash, Lytle Creek, and alluvial sands habitats south of Lytle Creek) between February and April.*	Prior to construction	Report	On completion of survey	BLM/CDFG	
		3-6(b)	*If this species is found within the ROW, either the ROW shall be rerouted to avoid breeding habitat, or, with the approval of BLM and USFS, the population shall be temporarily removed and housed off site, then reintroduced following habitat restoration.*	Prior to construction	Inspection; consultation	On completion of survey	BLM/CDFG	
3-7	**Construction of the proposed pipeline will result in the permanent elimination of approximately 25 acres of Category 1 desert tortoise**	3-7(a)	*Portions of the ROW where tortoises or their sign were found during the preliminary survey shall be surveyed according to the most recent published protocol during a high activity season*	Prior to construction	Inspection; consultation	Weekly	BLM/CDFG	

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
	habitat for Cajon Terminal construction and a temporary elimination of approximately 385 acres along the length of the ROW. Construction could also result in the inadvertent death of, or injury to, individual tortoises.		*for the tortoise (late March through mid-June, or in September), and occupied burrows shall be hand-excavated by biologists, under federal permit and MOU from CDFG. Tortoises removed shall be placed in newly constructed burrows at least 150 feet from the boundary of the ROW and fenced in for up to one week to maximize the chance of adopting the artificial burrow.*					
		3-7(b)	*Following pre-construction surveys and relocations, construction of the pipeline within tortoise habitat shall be restricted to October through March, when tortoises are hibernating.*	During construction	Inspection	Periodically	BLM	
		3-7(c)	*A wildlife biologist with desert tortoise expertise, acceptable to the BLM, USFWS, and CDFG, will be present during construction. Tortoises encountered and observed will be handled in accordance with the appropriate established protocols as described in Technical Appendix I (Biological Evaluation/Biological Assessment).*	During construction	Inspection	Weekly	BLM	
		3-7(d)	*Funding as determined by the BLM and CDFG shall be provided for the rehabilitation of inadvertently injured tortoises.*	Throughout project	Payment	Periodically	BLM	
3-8	**Construction along the pipeline route may result in disruption of disjunct populations of the zebra-tailed lizard.**	3-8	*A focused survey of the zebra-tailed lizard populations along the pipeline route shall be conducted to ascertain the zebra-tailed lizard distributions and population mapping in the vicinity of the pipeline ROW in the Cajon and Lytle Creek washes. If population levels are*	Prior to construction	Submission of report	On completion of survey	BLM	

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
			adequate to ensure recolonization of the ROW following revegetation or population mapping demonstrates that the population are distant from the ROW then no further mitigation will be implemented; if they are not, additional specific Mitigation Measures will be developed in consultation with CDFG and USFWS and be implemented.					
3-9	**Construction noise may affect wildlife species, especially birds and breeding amphibians, in habitats adjacent to the pipeline route.**	3-9(a)	*Along riparian areas (Cajon Wash, Lytle Creek, Whittier Narrows area), and in the Baldy Mesa area, construction activity shall be restricted to mid-summer and fall to reduce potential impacts upon breeding birds. (See Mitigation Measure 3-5).*	During construction	Inspection	Periodically	BLM	
		3-9(b)	*During the breeding season of vocal amphibians, from January 1 through March 31, construction in the vicinity of suitable breeding habitat shall be limited to the daylight hours.*	During construction	Inspection	Periodically	BLM	
3-10	**The increased presence of people in remote areas increases the potential for wildlife harassment and illegal hunting and collecting.**	3-10(a)	*Vehicle operation off the ROW shall be prohibited except where specified by the landowner or land management agency.*	During construction	Inspection	Weekly	BLM	
		3-10(b)	*Mitigation Measures discussed in Mitigation Measure 2-1(d)(vi), a part of the Erosion and Sediment Control Element of the COM Plan, will preclude illegal OHV activity within the National Forest boundary.*	Prior to construction	Submission of the COM Plan	Completion of design	BLM	
		3-10(c)	*No firearms shall be allowed in the construction area. Employees shall be instructed that no hunting or collecting*	During construction	Inspection	Periodically	BLM	

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
			will be allowed. The names of any employees found to be violating these rules will be provided to the appropriate agency.					
3-11	**Terrestrial plant communities and wildlife could be destroyed or damaged by an oil spill if the pipeline were to rupture or leak.**	3-11(a)	*Refer to the Mitigation Measures recommended within Section 12 (System Safety and Responsibility) regarding details for spill prevention.*	Not applicable				Refer to Mitigation Measure 12-1
		3-11(b)	*An Oil Spill Contingency Plan shall provide for the pipeline owner's financial responsibility for any clean-up on public lands, and will give the BLM or Forest Service final decision-making authority as to the completeness of any such clean-up. This plan shall be reviewed by the Emergency Response Review Committee. The committee shall provide recommendations to the Lead Agencies for implementation of the plan. This plan shall be finalized and approved by the Lead Agencies (BLM, USFS and the City of Adelanto).*	Prior to operation	Submission of the OSC Plan	Completion of plan review	BLM	
		3-11(c)	*Automated block and check valves shall be installed at major stream crossings and reaches of streams where the route is parallel to the waterway (Refer to Mitigation Measure 2-5).*	Not applicable				Refer to Mitigation Measure 1-5
3-12	**Damage to aquatic habitats and to many species dependent upon it could result from failure of the pipeline near a stream crossing and consequent discharge of oil into a watercourse.**	3-12	*Implementation of Mitigation Measures 3-10(a), (b) and (c) and 2-6.*	Not applicable				Refer to Mitigation Measure 3-10 and 2-6.

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
3-13	**Degradation of terrestrial habitats, or of aquatic habitats downslope from pipeline construction and staging areas, could result from spills or discharge of hazardous materials used in construction and welding.**	3-13(a)	*Material Safety Data Sheets for all hazardous materials to be used on portions of the pipeline route that cross public lands shall be submitted to the agencies with jurisdiction over those lands.*	During construction	Report	Periodically	BLM	
		3-13(b)	*All hazardous materials to be used shall be stored and used properly in all construction and staging areas.*	During construction	Inspection	Periodically	BLM	
		3-13(c)	*An Oil Spill Contingency Plan for prompt and complete remediation of any spills that could occur in construction or staging areas shall be submitted to the Lead Agencies (BLM, USFS, and the City of Adelanto) prior to the initiation of construction activities, and shall be implemented in the event of any spills. This plan shall be reviewed by the Emergency Response Review Committee. The committee shall provide recommendations to the Lead Agencies for implementation of the plan. This plan shall be finalized and approved by the Lead Agencies.*	Prior to construction	Submission of plan	Completion of plan review	BLM	
4. Air Quality								
4-1	**Air pollutant emissions would result from the operation of construction equipment on- and off-site, from disturbed soil, and from transport of workers, equipment and materials.**	4-1	*A Dust Control Plan shall be submitted to the San Bernardino County Air Pollution Control District and the South Coast Air Quality Management District for approval prior to construction. The plan shall include measures for watering of unpaved ares to reduce particulate emissions, moistening of vehicle loads, stabilization of stock*	Prior to construction	Report	Completion of plan review	BLM	

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
			piles, and inspection of emission controls systems on heavy equipment.					
4-2	**Pipeline operation would not result in significant air emissions.**	4-2	*None required.*	Not applicable				
4-3	**An accidental oil spill would result in release of hydrocarbon vapors immediately following a spill.**	4-3	*None required.*	Not applicable				
5. Noise								
5-1	**Community noise levels would be permanently increased in the vicinity of the two pump stations.**	5-1	*None required.*					
5-2	**Community noise levels would be temporarily increased as a result of pipeline construction.**	5-2(a)	*The expected duration of construction at any one location shall be no more than 5 days with the exception of the terminals and pump stations. Construction activities shall be limited to between the hours of 6:00 a.m. and 5:00 p.m. weekdays, and between 8:00 am to 6:00 pm Saturday and Sunday, except where city staffs have requested otherwise to alleviate traffic impacts or where local noise ordinances limit the hours of allowable construction activities. Nighttime construction shall be performed in commercial areas where requested by agency personnel.*	Prior to inspection	Inspection	Periodically	BLM	
		5-2(b)	*Public notification signs shall be erected along the right-of-way within urban areas prior to the commencement of construction.*					

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
6. Visual Resources								
6-1	**Development of Cajon Terminal would alter existing visual resources and change existing views from State Route 58.**	6-1(a)	*To ensure that storage tanks and all other above ground facilities contrast as little as possible with the surrounding desert environment, the project proponent shall submit to the BLM for approval, a materials board that displays a sample of the surface soil alongside the specific paint type to be used for each facility. Material boards shall be submitted for each facility located in the desert.*	Prior to construction	Submission of COM Plan	Completion of design review	BLM	
		6-1(b)	*Earthen levies surrounding the containment tanks shall be designed to look natural (i.e. mounded forms), rather than manufactured (flat surfaces).*	Prior to construction	Submission of COM Plan	Completion of design review	BLM	
		6-1(c)	*The minimum height to diameter ratios feasible for storage tanks shall be considered in order to reduce tank heights as seen along the highway by lowering the tanks and/or increasing the height of the earthen levies.*	Prior to construction	Submission of COM Plan	Completion of design review	BLM	
6-2	**Construction of the pipeline route through the high desert would require grading and the use of heavy equipment within a 70-foot right-of-way.**	6-2(a)	*Areas disturbed by pipeline construction shall, to the maximum extent feasible, be regraded, imprinted and revegetated to restore their original appearance in accordance with the Erosion and Sediment Control Element of the COM Plan and to the satisfaction of the Erosion and Sediment Control Review Committee.*	Prior to construction	Submission of COM Plan	Completion of design review	BLM	
		6-2(b)	*The pipeline route shall avoid the removal of Joshua trees through the minimization of disturbance within the*	Prior to construction	Submission of COM Plan	Completion of design review	BLM	

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
			ROW in areas of Joshua tree woodland. Joshua trees less than 7 feet that would be removed by grading shall be relocated outside of the ROW. Plant relocations shall be identified by tagging of specimens prior to grading of the ROW.					
		6-2(c)	*All construction activities, including vehicle movement and storage of materials, shall be confined within the pipeline right-of-way. Care shall be taken during construction to avoid damage to vegetation and habitats not directly involved in project construction.*	During construction	Inspection	Weekly	BLM	
6-3	**Construction of the Adelanto pump station would result in the conversion of 2.2 acres of vacant land to a built use.**	6-3	*The site perimeter and parking lot shall be attractively landscaped to screen the facility and enhance the visual quality of the surrounding area subject to review and approval by City of Adelanto.*	Prior to operations	Inspection	Completion of construction	BLM	
6-4	**Construction of the pipeline route through the Kramer Hills and the Cajon Pass would result in some landform alteration and the clearing of a right-of-way on visually prominent mountain slopes.**	6-4(a)	*Construction activities and landform alteration on all mountain slopes shall be restricted to the existing Baldy Mesa Road from M.P. 55 to M.P. 63. Construction between M.P. 59 to M.P 60 shall be restricted to a graded swath of 50 feet of the existing cleared right-of-way of the CalNev gas pipeline.*	During construction	Inspection	Weekly	BLM	
		6-4(b)	Construction activities and landform alterations on all mountain slopes shall be restricted to existing transmission access roads and existing rural roads from M.P. 20 to M.P. 25 within the Kramer Hills. Construction from M.P. 22 to M.P. 23 shall be restricted to a graded swath of 50 feet on undisturbed slopes in these areas.	During construction	Inspection	Weekly	BLM	

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
		6-4(c)	*Implementation of Mitigation Measure 2-1(c). The revegetation actions shall be designed to recreate original contours to the degree feasible.*	Prior to construction	Submission of COM Plan	Completion of design review	BLM	
		6-4(d)	*There shall be no pipeline facilities above ground within the Forest Service boundary except for sign markers and cathodic protection devices. Signing colors and size are dictated by Federal Regulation. Cathodic protection devices shall be painted to blend into and harmonize with the background colors of BLM and Forest lands, using a color approved by the BLM or Forest Service.*	Prior to construction	Submission of COM Plan	Completion of design review	BLM	Engineering specifications as part of the COM Plan
6-5	**Construction of the pipeline route from M.P. 67 to the City of Carson could result in a loss of trees and vegetation alongside highways and other roadways.**	6-5	*In urban areas, prior to removal of any trees along the pipeline route, a tree removal and planting plan shall be submitted to the local jurisdiction for approval. Where mature trees (6-inch in diameter and larger) are removed they shall be replaced on a one-to-one basis with similar species to the satisfaction of the landowner.*	Prior to construction	Submission of the removal and planting plan	Completion of plan review	BLM	
6-6	**An accidental oil spill would result in conspicuous mark upon open ground in sensitive visual or urban areas.**	6-6(a)	*An Oil Spill Contingency Plan shall be developed which would include procedures for revegetation of spill zones within rural areas. This plan shall be reviewed by the Emergency Response Review Committee. The committee shall provide recommendations to the Lead Agencies for implementation of the plan. This plan shall be finalized and approved by the Lead Agencies (BLM, USFS and the City of Adelanto).*	Prior to operation	Submission of OSC Plan	Completion of Plan review	BLM	

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
		6-6(b)	*Implementation of Mitigation Measures in Section 12 to contain and reduce spills.*	Not applicable				Refer to Mitigation Measure 12-1
7. Land Use								
7-1	**Development of the proposed pumping stations (Cajon Terminal and the Adelanto Station) would occupy a total of 27.2 acres of vacant land.**	7-1	*None required.*	Not applicable				
7-2	**Construction of the proposed pipeline will result in a temporary disruption of the surrounding area.**	7-2	*None required.*	Not applicable				
7-3	**Construction of the proposed pipeline in the Cajon Pass would result in a temporary disruption of the surrounding area.**	7-3	*None required.*	Not applicable				
7-4	**Construction of the proposed pipeline in developed areas would result in a temporary disruption of the surrounding area.**	7-4(a)	*Construction activities shall be confined to the hours between 6:00 a.m. and 5:00 p.m. weekdays, and 8:00 a.m. to 6:00 p.m. Saturdays and Sundays within 300 feet of any residence or hospital structure housing patients. Construction staging areas shall be located in industrial, commercial, or undeveloped areas. Construction vehicles shall avoid utilizing residential streets to the extent feasible.*	During construction	Inspection	Periodically	BLM	
		7-4(b)	*Refer to Mitigation Measures of Section 10, Transportation and Circulation.*	Not applicable				Refer to Mitigation Measures 10

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
		7-4(c)	*Construction in any single location shall be constrained to between two to five days except at the Adelanto Pump Station and Cajon Terminal where construction duration shall be overseen by the City of Adelanto.*	During construction	Inspection	Weekly	BLM	
		7-4(d)	*When pipeline facilities are removed at the end of the life of the pipeline, the ground surface shall be restored to its previous condition, including revegetation. In natural areas, nature species appropriate to individual locations shall be utilized for revegetation.*	Following decommission-ing	Inspection	Periodically	BLM	
7-5	**An oil spill in urban and rural areas could result in contamination of private property and restriction of land use.**	7-5(a)	*An Oil Spill Contingency Plan shall be developed which would include containment measures to limit the extent of the spill and emergency plan for traffic control in urban areas. This plan shall be reviewed by the Emergency Response Review Committee. The committee shall provide recommendations to the Lead Agencies for implementation of the plan. This plan shall be finalized and approved by the Lead Agencies (BLM, USFS and the City of Adelanto).*	Prior to operation	Completion of OSC Plan	Completion of plan review	BLM	
		7-5(b)	*Implementation of Mitigation Measures in Section 12 to contain and reduce spills.*	Not applicable				Refer to Mitigation Measure 12-1
8. Public Utilities								
8-1	**Pipeline excavation could accidentally damage and/or disrupt service of existing utility lines.**	8-1(a)	*California State legislation requires that at least two days prior to excavation of any subsurface installations, the excavator, in this case the Cajon*	During construction	Report	Periodically	BLM	

TABLE 3-1
MITIGATION MONITORING PROGRAM

Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
		Pipeline Company, is required to contact a regional notification center. The regional notification center, known as Underground Service Alert for the Southern California area, will notify affected members of impending excavation at or near their underground installations. The notified members are required to mark the specific location of their facilities within the work area prior to the start of excavation. Legislation requires the excavator to expose the underground facilities by hand before using power equipment. Failure to follow this procedure could result in a fine of up to $50,000 and charges for the repair of any damages to the underground facilities.					
	8-1(b)	*The alignment of the pipeline will be designed to minimize or avoid interference with plans, policies, and existing and planned infrastructure during its construction. All affected agencies will be consulted regarding the precise alignment of the pipeline within their respective jurisdictions in order to minimize or avoid interference with existing and planned infrastructure and public facilities.*	Prior to construction	Submission of COM Plan	Completion of review plan	BLM	
	8-1(c)	*A list of contact names and telephones for each agency and utility company whose lines will be crossed will be kept with the construction supervisor for that street crew. Representatives of utility agencies and companies shall be requested to be onsite on the day that utilities under their jurisdiction or ownership are being crossed.*					

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
		8-1(d)	*In the event a utility is interrupted, the agency or company whose service has been disrupted shall be contacted immediately. All construction work shall cease until service has been resumed.*					
8-2	**Development of the proposed pipeline within utility corridors could result in collocation dangers as a result of a catastrophic event.**	8-2(a)	*The Incident Command system shall set priorities for disaster repair efforts on utility lines and transportation networks. Those utility lines vital to the region must be repaired ahead of other lines.*	Prior to operation	Completion of OSC Plan	Completion of plan review	BLM	
		8-2(b)	*Development of an Oil Spill Contingency Plan as discussed in Mitigation Measure 12.*	Not applicable				Refer to Mitigation
8-3	**The proposed pipeline would be constructed adjacent to existing utilities in the USFS designated Cajon Pass Utility Corridor.**	8-3	*Any disputes arising between Cajon Pipeline Company and existing users of public lands will be resolved by the Forest Service and/or BLM. Existing users have the right to not be adversely impacted by the Pipeline, but their use of existing public land is not exclusive.*	During construction	Consultation	Periodically	USFS	
9. Socioeconomics								
9-1	**The local economy of San Bernardino County would be stimulated by a temporary increase in employment as the project would create 145 construction jobs lasting 60 to 70 days and 42 jobs lasting six to eight months. This would be a 1 percent increase in 1992 construction employment and a 6 percent share of projected**	9-1	*None required.*	Not applicable				

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
	growth in construction employment.							
9-2	The project would temporarily increase demand for housing for the 140 construction workers for a period of 60 to 70 days, and 9 workers in Adelanto for six months, and 23 workers at Cajon Terminal for eight months.	9-2	*None required.*	Not applicable				
9-3	The project would temporarily increase population in the adjacent cities by less than 1 percent in all cases except for 2 percent in Adelanto.	9-3	*None required.*	Not applicable				
9-4	The project would increase permanent employment in Adelanto by 25 to 30 employees or 1 percent over the 1992 estimate of 1,855 local jobs.	9-4	*None required.*	Not applicable				
9-5	The worst case increase in demand for permanent housing would amount to 26 units in Adelanto, or 14 percent of the projected average annual increase.	9-5	*None required.*	Not applicable				
9-6	The proposed project would not be expected to appreciably affect local jobs/housing balances.	9-6	*None required.*	Not applicable				
9-7	The proposed project would increase property tax revenue within the Study Area by about $616,000 in 1993 or 3.4 percent	9-7	*None required.*	Not applicable				

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
	of projected 1991/92 property tax revenue.							
9-8	The proposed project would not disrupt any of the cities economically or socially.	9-8	*None required.*	Not applicable				
9-9	The local economy would be stimulated by a temporary increase in employment as the project would create 40 construction jobs lasting 60 to 70 days. This would be less than a 1 percent increase in 1992 construction employment and a 1 percent share of projected growth in construction employment.	9-9	*None required.*	Not applicable				
9-10	The project would temporarily increase demand for housing for the 40 construction workers for a period of 60 to 70 days.	9-10	*None required.*	Not applicable				
9-11	The project would temporarily increase population in the adjacent cities by less than 1 percent in all cases except for 4 percent in the City of Industry, and less than 1 percent for the study area as a whole.	9-11	*None required.*	Not applicable				
9-12	The proposed project would increase property tax revenue within the Study Area by about $184,000 or 0.2 percent or projected 1991/92 property tax revenues.	9-12	*None required.*	Not applicable				

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
9-13	**The proposed project would not disrupt any of the Cities economically or socially, but the event of an oil spill could temporarily affect local business or a recreational area.**	9-13(a)	*An Oil Spill Contingency Plan shall be developed which would include procedures for containing crude flow and preventing delivery to the storm drain or sewer systems. This plan shall be reviewed by the Emergency Response Review Committee. The committee shall provide recommendations to the Lead Agencies for implementation of the plan. This plan shall be finalized and approved by the Lead Agencies (BLM, USFS and the City of Adelanto).*	Prior to operation	Submission of OSC Plan	Completion of plan review	BLM	
		9-13(b)	*Implementation of Mitigation Measures in Section 12 to contain and reduce spills.*	Not applicable				Refer to Mitigation Measure 12-1.
10. Transportation and Circulation								
10-1	**The pipeline route would require construction within road rights-of-way which may result in interruption to traffic flow.**	10-1(a)	*The Transportation Management Element of the COM Plan shall be prepared to detail specific roadway construction information; signing for closures; and, public notification identifying location, scheduling and duration of construction spread. This management element shall also include necessary Traffic Control Plans as required by local jurisdictions through which the pipeline route passes. This element shall be finalized and approved by the Lead Agencies (BLM, USFS, and the City of Adelanto).*	Prior to construction	Submission of COM Plan	Completion of design	BLM	Engineering specifications as part of the COM Plan
		10-1(b)	*On roadways where trenching shall occur within the roadway right-of-way, one travel lane shall be left open in each direction, delineated by temporary*	During construction	Inspection	Weekly	BLM	

TABLE 3-1
MITIGATION MONITORING PROGRAM

Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
		traffic cones/barricades. For minor collectors and neighborhood streets, one lane shall be left open with signal persons to direct through traffic. These street closures shall occur in coordination with city staff from each jurisdiction. Specific locations where two-way traffic is required shall be identified in consultation with city staff.					
	10-1(c)	*Construction work on major roadways and through major signalized intersections shall be conducted in off-peak periods (the hours outside of weekday peak commute hours of 7:00 AM to 9:00 AM and 3:30 PM to 6:00 PM), except where the city has requested otherwise to alleviate traffic impacts.*	During construction	Inspection	Weekly	BLM	
	10-1(d)	*Construction trenches shall not be left open, but covered by steel plates to allow access to private and commercial driveways. For safety of bicyclists, asphalt shall be placed around edges of steel plates to secure them and to eliminate abrupt edges.*	During construction	Inspection	Weekly	BLM	
	10-1(e)	*All County and municipal fire, police and paramedic departments shall be notified regarding the schedule and duration of construction activities. Alternative routes shall be identified that may be used to avoid construction areas.*	During construction	Reports	At notification	BLM	
	10-1(f)	Coordination shall be undertaken with appropriate transit authorities to ensure uninterrupted service along bus or train routes, which shall be crossed or	During construction	Reports	At notification	BLM	

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
			parallel by pipeline construction. Transit locations shall be relocated as necessary in coordination with appropriate agencies to provide access during construction.					
10-2	**Construction traffic and equipment staging may disrupt traffic movement.**	10-2(a)	*Staging areas for construction equipment and truck traffic shall be located off of the adjacent roadway.*	During construction	Inspection	Weekly	BLM	
		10-2(b)	*Heavy machinery such as cranes and boring equipment shall be delivered to each site in the off-peak periods, preferably at night (but outside of the hours 6:00 AM - 9:00 AM and 3:00 PM - 6:00 PM).*	During construction	Inspection	Weekly	BLM	
		10-2(c)	*Off-street parking for worker vehicles shall be provided in areas where parking is limited.*	During construction	Inspection	Weekly	BLM	
10-3	**Pipeline construction would require excavation across rural roads within public lands from M.P.0 to M.P.65.**	10-3(a)	Roads that cross public lands under the jurisdiction of the BLM shall be returned to the existing alignment and condition under the supervision of the BLM.	During construction	Inspection	Weekly	BLM	
		10-3(b)	*Roads within Forest Service lands shall be maintained as "roll-and-dip" preserving both existing vertical and horizontal alignment and reconstructed to the specifications of a Forest Engineer. This includes backfilling of the roadbed to 90 percent of maximum density as determined by AASHTO T-180 (American Association of State Highway and Transportation Officials) or ASTM D-1557 (American Society of Testing and Materials) and compacting disturbed soils near the roadbed to 100 percent of the density of adjacent soils.*	During construction	Inspection	Weekly	USFS	

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
		10-3(c)	*Forest roads interrupted by pipeline construction will have the duration of such interruption kept to a minimum, due to Forest Service needs for emergency fire access to the remote areas these roads serve. In addition, during such disruption, a reasonable detour will be provided in the immediate area by the contractor.*	During construction	Inspection	Weekly	USFS	
		10-3(d)	*To facilitate future Forest Service road maintenance, all structures appurtenant to the main pipe itself (such as cathodic test stations or route signing) will be located outside of the roadway, in such a manner as to not interfere with road maintenance activities.*	During construction	Inspector	Weekly	USFS	
		10-3(e)	*Pipeline burial depth within Forest roadways will be at least four feet to the top of the pipe, except where such roads cross drainages, and then such depth will be at least six feet to the top of the pipe. In addition, in all locations in which pipeline is located within Forest roadways, identification tape will be buried two feet above the top of the pipe.*	During construction	Inspection	Weekly	USFS	
		10-3(f)	*In order to facilitate forest fire service access along Baldy Mesa Road, USFS will require that up to 13 feet width will be open to traffic by 12 noon each day of construction. The roadway shall be capable of supporting 2,800 lbs.*	During construction	Inspection	Weekly	USFS	
10-4	**An accidental oil spill would result in traffic congestion during emergency response and clean-up.**	10-4	*None required.*	Not applicable				

TABLE 3-1
MITIGATION MONITORING PROGRAM

	Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
11. Cultural and Paleontological Resources								
11-1	**Pipeline construction would result in the disruption and potential impacts to only one potentially significant archaeological resources, CA-SBR-7086, a prehistoric site.**	11-1(a)	*Monitoring of the resources listed in Table 11-2 shall be completed by a certified/trained archaeological monitor under the supervision of a certified Principal Investigator. Any resources identified as a result of monitoring must be evaluated in accordance with federal regulations.*	During construction	Inspection	Periodically	BLM	
		11-1(b)	*Mitigation of the prehistoric site, CA-SBR-7086 must include a recovery of the surface materials using spatial controls and a series of subsurface testing units to ensure adequate data recovery to minimize adverse impact to the sites. Studies must be completed by trained personnel and under consultation with the BLM, overseer for this site, should any cultural resources be excavated or collected as part of mitigation for the project. These resources shall be curated in accordance with Federal Standards.*	Prior to construction	Inspection	Periodically	BLM	
11-2	**Approximately 86 miles of the Cajon Pipeline route was identified as having a high potential of containing significant paleontological resources.**	11-2(a)	*A qualified paleontologist shall be retained to perform inspections of excavation and to salvage exposed fossils within the areas designated as having a high potential for paleontological resources. Standard samples (2.4 cubic meters) shall be undertaken as recommended for specific areas within the Paleontologic Technical Report. The right-of-way excavation shall be inspected after brushing and the trench immediately after excavation. The paleontologist shall have the authority to halt*	During construction	Inspection	Weekly	BLM	

TABLE 3-1
MITIGATION MONITORING PROGRAM

Impact		Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
		excavation equipment when fossil resources are encountered in order to facilitate fossil removal.					
	11-2(b)	*A curation program shall be undertaken which includes preparation of recovered specimens to a point of identification, including screen washing fossiliferous sediment samples to recover small to microscopic vertebrate fossils and preparation of large fossils recovered in plaster jackets. Specimens shall be identified and curated into retrievable storage collections of the Earth Sciences Division of the San Bernardino County Museum.*	Following construction	Report	At completion of collection	BLM	
	11-2(c)	*A final report, including an itemized and assessioned inventory of recovered specimens, shall be distributed to the appropriate Lead Agencies. The acceptance of the report by the BLM shall signify completion of the paleontologic program.*	Following construction	Report	At completion of collection	BLM	
12. System Safety and Reliability							
12-1 **For the pipelines and pump stations it is projected three spills would occur over the life of the project ranging from 9.3 barrels to 1,000 barrels.**	12-1(a)	Construction Safety Measures i. *Support shall be provided for underground facilities in and near the construction area during work in the trench and backfilling operations to prevent damage to such facilities during construction activities.*	During construction	Inspection	Periodically	BLM	
		ii. *Hand tools shall be used in utility-intensive areas and within 24 inches of underground structures.*	During construction	Inspection	Weekly	BLM	

TABLE 3-1
MITIGATION MONITORING PROGRAM

Impact	Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
	iii. *In the event of inadvertent damage to an underground facility, work shall be halted in the immediate vicinity on Cajon Pipeline during facility report.*	During construction	Inspection	In event of emergency	BLM	
	iv. *The Cajon Pipeline Company will notify owners of any underground electrical facilities 48 hours in advance of excavation in the vicinity of these facilities. Cajon Pipeline Company will have an electrical contractor on-call at all times during construction near the potentially affected facility to repair any circuits if required by the owner in the event they are damaged during construction. The appropriate response to hazards associated with damage to natural gas pipelines will be determined in consultation with natural gas utility operators and local fire departments. Local fire departments will be notified of the schedule of construction activities in the vicinity of natural gas lines.*	Prior to and during construction	Report	At time of notification	BLM	
12-1(b)	<u>*Spill Prevention*</u> i. *The recommendations from geotechnical studies shall be implemented for proper pipeline design features in fault zones to accommodate potential ground movement.*	Prior to construction	Submission of COM Plan	Completion of design	BLM	
	ii. *Internal corrosion prevention techniques shall be implemented in accordance with the requirements of the California State Fire Marshal as*	Throughout project	Reports	Periodically	BLM	

TABLE 3-1
MITIGATION MONITORING PROGRAM

Impact	Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
	part of pipeline maintenance procedures. Such activities may include routinely scheduled periodic pigging of the pipeline on a frequent basis to remove pockets of accumulated fluids that contribute to internal corrosion, such as hydrogen sulfide, carbon dioxide, water and other impurities, or introducing corrosion inhibitors into the crude stream periodically in sufficient quantities to protect the entire potentially affected portion of the system, inspection of the internal surface for corrosion of any pipe removed from the pipeline for any reason, and maintenance of records of this inspection by State Fire Marshall's field engineers.					
	iii. *The pipeline will be concrete coated at crossings of Cajon Wash (M.P. 72), Los Angeles River (M.P. 135.7), and San Jose Creek (M.P. 110.1 - 117.2), to help reduce the risk of oil spill effects on significant water supplies and biologically sensitive areas.* *The pipeline bored under the California Aqueduct shall be installed inside a casing pipe within DWR's right-of-way. The casing pipe and the pipeline shall be cathodically protected and dielectrically isolated from each other. In addition, the pipeline shall be dielectrically coated and sealed to the casing by the use of a link seal or equivalent. A 2-inch I.D.*	*Prior to construction*	*Submission of COM Plan*	*Completion of design*	*BLM*	

TABLE 3-1
MITIGATION MONITORING PROGRAM

Impact	Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
	drain line shall be provided for at the low end of the casing pipe, sloped towards daylight, and away from the Aqueduct. A 3-inch standard weight galvanized steelguard post shall be installed adjacent to each drain line. The post shall extend three feet above the ground and 18-inches below ground. The bottom of the post shall be embedded in at least one cubic foot of concrete. *The pipeline shall be either concrete coated or installed inside casing pipe adjacent to the Etiwanda Creek percolation basins. The design of the pipeline at this location shall be finalized following consultation with the San Bernardino County Flood Control District.*					
12-1(c)	*Minimize Spill Volume* i. *Additional remote-controlled motor-operated valves and check valves will reduce the maximum potential spill volume along the pipeline route. Table 3-1 presents locations where valves would effectively control maximum spill potential.*	Prior to construction	Submission of COM Plan	Completion of design	BLM	
	ii. *Even speed and vibration sensors will be installed at pump stations to shutdown the pipeline automatically in the event that the threshold acceleration should be exceeded.*	Prior to operation	Submission of OSC Plan	Completion of plan review	BLM	

TABLE 3-1
MITIGATION MONITORING PROGRAM

Impact	Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
	12-1(d) *Spill Containment and Response* i. *Cajon shall maintain an up-to-date Oil Spill Contingency Plan specific to the Cajon Pipeline in compliance with 49 CFR 195.402 subject to the review and approval of the California State Fire Marshall. This plan shall be reviewed by the Emergency Response Review Committee. The committee shall provide recommendations to the Lead Agencies for implementation of the plan. This plan shall be finalized and approved by the Lead Agencies (BLM, USFS and the City of Adelanto) In addition to compliance with all requirements of 49 CFR 195.402, the California State Fire Marshall should specifically review the Oil Spill Contingency Plan's methods and instructions for containing oil across land, down stream channels and in water. The removal of contained vegetation and methods to protect and care for birds and wildlife in the event they become soiled with oil are also important plan components to be considered in the state Fire marshall's review.* *In addition, the plan must include a list of not only the names and telephone numbers of the pre-approved response contractors, but information on the type and amount of equipment each can provide, number of laborers available and estimated time to mobilize the response team. A listing of names,*	Prior to operation	Submission of OSC Plan	Completion of plan review	BLM	

TABLE 3-1
MITIGATION MONITORING PROGRAM

Impact	Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
	numbers and addressed must be provided for emergency access to private lands along the pipeline route. Areas of particular biological sensitivity must be noted and special clean-up techniques outlines should these areas be contaminated. Additionally, areas of archaeological or paleontological significance within the potentially affected spill area that are discovered during the lifetime of the project must be noted in the Oil Spill Contingency Plan. Special clean-up techniques, such as not operating bulldozers, in these areas may be required to reduce impacts on these resources and must be described in the Oil Spill Contingency Plan. Provisions to rehabilitate the habitat affected by the spill and/or by clean-up activities must also be included in the plan. A monitoring program must be established to assess the rate and overall success of the clean-up and reclamation efforts.					
	ii. *Copies of the approved Oil Spill Contingency Plan must be distributed to all agencies crossed by the pipeline route and local fire departments who may be called on for emergency response. Copies of all updates must be provided.*	Prior to operation	Submission of OSC Plan	Completion of plan review	BLM	
	iii. *Appropriate containment and cleanup measures addressing storm drain and flood control channels will*	Prior to operation	Submission of OSC Plan	Completion of plan review	BLM	

TABLE 3-1
MITIGATION MONITORING PROGRAM

Impact	Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
	also be addressed in the Oil Spill Contingency Plan.					
	iv. *Procedures to be followed shall be provided to local fire and police officials and Forest Service and BLM personnel, as they would generally be the first response personnel on-scene in the event of a spill*	Prior to operation	Report	At notification	BLM	
	v. *Oil spill containment and response equipment shall be supplied and maintained at locations accessible to first response personnel along the route to facilitate rapid response to an oil spill.*	Prior to operation	Inspection	On completion	BLM/USFS	
	vi. *A public education program shall be conducted consistent with 49 CFR 195.440 under the supervision of the California State Fire Marshall to help the public and agencies understand pipeline safety hazards. This program will include distribution of a brochure explaining how to recognize a leak, what to do in the event of a spill and who to call. The brochure will be available to homeowners and residents along the pipeline route, and will be actively distributed by Cajon Pipeline Company along with construction notifications during the installation of the proposed pipeline.*	Prior to operation	Report	At notification	BLM	
	vii. *On-site drainage and collection systems along the route shall include curb construction on the downstream side of Old Cajon*	Prior to construction	Submission of COM Plan	Completion of design	BLM	

TABLE 3-1
MITIGATION MONITORING PROGRAM

Impact	Mitigation Measure	Implementation Timing	Monitoring Action	Monitoring Frequency	Responsible or Lead Agency	Comments
	Boulevard (M.P. 72) to retain oil and provide additional time for emergency response personnel to arrive and implement response efforts prior to contamination of adjacent waters.					

4.0 Written Responses and Comments

4. WRITTEN COMMENTS AND RESPONSES

4.1 INTRODUCTION

This chapter presents all written comment letter received from the public and agencies during the review of the Draft EIS/EIR from November 20, 1992 through January 5, 1993. Specific responses to each comment are presented in this chapter. The Draft EIS/EIR text has been revised where appropriate resulting in an inclusive Final EIS/EIR. Specific sections of the Final EIS/EIR which were modified in response to comments, are cited in the specific response to assist commentors with their review of specific concerns. A summary of the major issues which have been raised by commentors and issues or components of the project which have been revised as a result of comments have been summarized below for the convenience of the reader.

4.2 SUMMARY OF PUBLIC CONCERNS

4.2.1 Public Notice and Public Input

The procedure followed for the notice period for the Draft EIS/EIR was of some concern to members of the public. Public review of the Draft EIS/EIR was advertised in three newspapers in Pomona. San Bernardino and Long Beach and was consistent with the guidelines for notification. The document was widely distributed and was also available from a number of public libraries. The distribution list for the Draft is included within Appendix C of the Final EIS/EIR.

Various individuals and public agencies were concerned on the ability for the public to provide input to the plans which will be compiled as part of the COM Plan, in particular the emergency response requirements and sediment and erosion control measures. In order to address the concerns that public input should be considered the BLM and the City of Adelanto have proposed that two committees be assembled to address the need for public input, to provide oversight and to monitor implementation of the Erosion and Sedimentation Control Plan and emergency response procedures. The roles and members of these committees are described below.

Erosion and Sediment Control Plan Review Committee

This committee would consist of five members: representatives of the BLM, City of Adelanto, USFS, Cajon Pipeline Company and one nominee from the general public. Each committee member would be a specialist with qualifications and experience to review the proposed plan. The committee would be required to review the administrative final of the proposed plan for Erosion and Sediment Control and provide recommendations to the lead agencies for implementation of the plan. These recommendations

would be assessed by the lead agencies and where appropriate incorporated into the final plan for adoption. The committee would also provide review and oversight of implementation of mitigation measures as prescribed in the plan as described in the section on Monitoring below.

Emergency Response Review Committee

This committee would consist of seven members: representatives of the BLM, City of Adelanto, USFS, Cajon Pipeline Company and three nominees selected by the City of Adelanto from affected jurisdictions along the pipeline route. Each committee member would be a specialist with qualifications and experience to review the elements relating to emergency response. The committee would be required to review the administrative final of the proposed emergency response plan and provide recommendations to the lead agencies for the implementation of the plan. These recommendations would be assessed by the lead agencies and were appropriate incorporated into the final plan for adoption. The committee would also provide review and oversight of implementation of mitigation measures as prescribed in the plan as described in the section on Monitoring below.

4.2.2 Revisions to the Project Description

The proposed pipeline route within the Draft EIS/EIR has been revised to reflect some locational concerns and additional opportunities to the Cajon Pipeline Company. At M.P. 52, the pipeline was originally located within 0.25 miles of the Baldy Mesa Elementary school on Baldy Mesa Road. In response to public concerns, the pipeline has been rerouted to provide a separation distance 0.5 miles. At M.P. 141, the pipeline was proposed to pass through a closed landfill in the City of Carson. To avoid potential problems regarding contamination, the pipeline route has been rerouted along Alameda Boulevard and the Dominguez Channel.

4.2.3 System Safety

A number of individuals and agencies commented upon the ability of the pipeline to withstand earthquake hazards, to be susceptible to collocation dangers and the resultant public hazard from an oil spill. A fault rupture is considered to be the greatest geologic hazard to pipelines. Pipeline fault design minimizes the potential for rupture by specific details pertaining to alignment and trench design at the fault crossing. Sections of the pipeline can be isolated if a fault rupture would cause a pipeline leak or break. Collocation danger does increase the potential magnitude of hazard in the event of a rupture and fire in multiple pipelines. The placement of the Cajon Pipeline would not present any unusual hazard beyond that presented by existing pipelines. The crude oil to be carried in the Cajon Pipeline is less volatile than natural gas or fuel pipelines which currently exist within the vicinity of the proposed Cajon Pipeline route, and since it will be a new pipeline of heavy construction, it would be less subject to rupture than many existing lines. A sophisticated detection system is also utilized to determine if a leak or rupture occurs along the pipeline length.

4.2.4 Cumulative Impacts

A list of projects which are presently planned or proposed to occur within the vicinity of the proposed pipeline were listed within the Draft EIS/EIR. From comments received during public review, this list has been revised to reflect additional projects which may occur along the pipeline right-of-way. A number of jurisdictions were particularly concerned regarding the timing of individual projects. Construction scheduling at this time is only approximately known, however to ensure that project construction does not interfere with other projects, coordination shall be undertaken with the respective jurisdiction. This requirement is more clearly stated within the mitigation measures for utilities and transportation.

4.2.5 Monitoring

A number of individuals and agencies expressed concerns regarding monitoring of mitigation measures, specifically dealing with sediment control, revegetation, emergency response, and public safety issues. Section 3.3 of this document (Volume II, Response to Comments) details the manner in which project mitigation will be monitored. Of particular note is the establishment of two committees, the Erosion and Sediment Control Review Committee and the Emergency Response Review Committee. These ad hoc committees are made of members who are technical professionals from the lead and affected agencies. The committees will be responsible for reviewing the proposed plans and intermittently monitor the implementation and effectiveness of the mitigation measures.

4.2.6 Revegetation

A number of concerns were expressed by individuals regarding the success of revegetation and the components of the plans for revegetation and erosion control. The complete Erosion and Sediment Control Plan shall be completed as part of the COM Plan. However, to be responsive to the concerns raised by the public the BLM has proposed the formation of a review and oversight committee which would include members from the responsible and lead agencies and a nominee of the public. In this way concerns raised by individuals can be addressed and incorporated if found to be relevant and appropriate.

4.2.7 Construction Impacts to Urban Areas

Affected cities along the proposed Cajon Pipeline route expressed concerns regarding the interpretation of traffic flow, levels of services, and conflicts with existing utilities within right-of-ways during the construction of the Cajon Pipeline. To address this concern, a Transportation Management Mitigation Measure has been added to the document (refer to Mitigation Measure 5.10.1-1[a]). This mitigation measure requires that a detailed Transportation Management Plan be prepared and approved by the lead and cooperating (affected) agencies to detail specific roadway construction information, including signing for closures and public notification to identify the locations, scheduling, and duration of the construction activities. This management plan will also include the approval of the necessary traffic control and detour plans.

4.3 COMMENTS AND RESPONSES

This Section includes all comments received on the Draft EIS/EIR during the public review period from November 20, 1992 to January 5, 1993. In response to concerns regarding availability of this document, comments which were received prior to January 31, 1993 are also included. Table 4-1 lists all written comments received in chronological order, and Table 4-2 lists all written comments alphabetically by writer. Letters and responses are shown next to each other on the following pages.

TABLE 4-1
RESPONSES TO THE DRAFT EIS/EIR
(In Chronological Order)

Letter Number	Date	Respondent
1	11-06-92	San Gabriel Valley Municipal Water District
2	11-11-92	Dr. H. G. Wilshire
3	11-12-92	California State Fire Marshal's Office
4	11-12-92	California Department of Transportation
5	11-13-92	Burl and Joyce Hostetter
6	11-18-92	California Native Plant Society Bristlecone Chapter
7	11-30-92	Resources Agency of California
8	12-06-92	Darlene Brigel
9	12-09-92	Mrs. John Howard
10	12-10-92	California Archaeological Inventory
11	12-11-92	California Department of Fish and Game
12	12-14-92	Governor's Office of Planning & Research
13	12-14-92	City of Paramount
14	12-14-92	Southern California Association of Governments
15	12-15-92	City of Carson
16	12-16-92	United States Department of Interior
17	12-17-92	County of Los Angeles Department of Regional Planning
18	12-17-92	City of Ontario
19	12-21-92	County of San Bernardino Transportation/Flood Control Department
20	12-21-92	California State Fire Marshal's Office
21	12-21-92	State Land Commission
22	12-21-92	County of San Bernardino Board of Supervisors
23	12-22-92	Resources Agency of California
24	12-22-92	Mojave Water Agency
25	12-23-92	City of South Gate
26	12-23-92	City of Los Angeles Department of Water and Power
27	12-28-92	Metropolitan Water District of Southern California
28	12-28-92	White Road Property Owners Association
29	12-29-92	G.T.E.
30	12-29-92	County of Los Angeles Department of Public Works

TABLE 4-1
RESPONSES TO THE DRAFT EIS/EIR
(In Chronological Order)

Letter Number	Date	Respondent
31	12-29-92	City of Fontana
32	12-30-92	California Public Utilities Commission
33	12-31-92	City of Pomona
34	01-02-93	California Native Plant Society
35	01-04-93	Pacific Pipeline System, Inc.
36	01-04-93	City of Los Angeles Department of Water and Power
37	01-04-93	Carole Hayter
38	01-04-93	City of Pico Rivera
39	01-05-93	County of San Bernardino Air Pollution Control District
40	01-05-93	Baldy Mesa Water District
41	01-05-93	City of Downey
42	01-05-93	Pacific Pipeline System, Inc.
43	01-05-93	Chino Basin Municipal Water District
44	01-05-93	County of Santa Barbara Resources Management Agency
45	01-07-93	Sabo & Green
46	01-07-93	City of Rancho Cucamonga
47	01-12-93	Mr. and Mrs. C. C. Ward
48	01-08-93	South Coast Air Quality Management District
49	01-22-93	California Department of Education
50	01-22-93	Snowline Unified School District
51	01-27-93	Pacific Pipeline System, Inc.

TABLE 4-3
RESPONSES TO THE DRAFT EIS/EIR
(In Alphabetical Order)

Respondent	Letter Number	Date
Baldy Mesa Water District	40	01-05-93
Brigel, Darlene	8	12-06-92
California Archaeological Inventory	10	12-10-92
California Department of Education	49	01-22-93
California Department of Transportation	4	11-12-92
California Department of Fish and Game	11	12-11-92
California Native Plant Society	34	01-02-93
California Native Plant Society Bristlecone Chapter	6	11-18-92
California Public Utilities Commission	32	12-30-92
California State Fire Marshal's Office	3	11-12-92
California State Fire Marshal's Office	20	12-21-92
Chino Basin Municipal Water District	43	01-05-93
City of Carson	15	12-15-92
City of Downey	41	01-05-93
City of Fontana	31	12-29-92
City of Los Angeles Department of Water and Power	36	01-04-93
City of Los Angeles Department of Water and Power	26	12-23-92
City of Ontario	18	12-17-92
City of Paramount	13	12-14-92
City of Pico Rivera	38	01-04-93
City of Pomona	33	12-31-92
City of Rancho Cucamonga	46	01-07-93
City of South Gate	25	12-23-92
County of Los Angeles Department of Public Works	30	12-29-92
County of Los Angeles Department of Regional Planning	17	12-17-92
County of San Bernardino Air Pollution Control District	39	01-05-93
County of San Bernardino Transportation/Flood Control Department	19	12-21-92
County of San Bernardino Board of Supervisors	22	12-21-92
County of Santa Barbara Resources Management Agency	44	01-05-93
G.T.E.	29	12-29-92

TABLE 4-3
RESPONSES TO THE DRAFT EIS/EIR
(In Alphabetical Order)

Respondent	Letter Number	Date
Governor's Office of Planning & Research	12	12-14-92
Hayter, Carole	37	01-04-93
Hostetter, Burl and Joyce	5	11-13-92
Howard, Mrs. J.	9	12-09-92
Metropolitan Water District of Southern California	27	12-28-92
Mojave Water Agency	24	12-22-92
Pacific Pipeline System, Inc.	35	01-04-93
Pacific Pipeline System, Inc.	42	01-05-93
Pacific Pipeline System, Inc.	51	01-27-93
Resources Agency of California	7	11-30-92
Resources Agency of California	23	12-22-92
Sabo & Green	45	01-07-93
San Gabriel Valley Municipal Water District	1	11-06-92
Snowline Unified School District	50	01-22-93
South Coast Air Quality Management District	48	01-19-93
Southern California Association of Governments	14	12-14-92
State Lands Commission	21	12-21-92
United States Department of Interior	16	12-16-92
Ward, Mr. and Mrs. C. C.	47	01-12-93
White Road Property Owners Association	28	12-28-92
Wilshire, Dr. H. G.	2	11-11-92

COMMENT LETTER 1:
SAN GABRIEL MUNICIPAL WATER DISTRICT

SAN GABRIEL VALLEY MUNICIPAL WATER DISTRICT
949 EAST SIERRA MADRE AVENUE
P.O. Box 1299
AZUSA, CALIFORNIA 91702-1299
(818) 969-7911
FACSIMILE (818) 969-7797

November 8, 1992

Bureau of Land Management
6221 Box Springs Blvd.
Riverside, CA 92507-0714

Attn: Mr. Stephen L. Johnson

Re: Cajon Pipeline Draft EIR
(CA-27497 1732, 2880 CA-060.5)

Dear Mr. Johnson:

We have reviewed the Draft EIR for the proposed Cajon Pipeline Project, dated November, 1992 and find it acceptable.

Since this project will cross our 41" (inch) high pressure water transmission pipeline near East Avenue and Baseline (your page 13) we have submitted plans and profiles of our pipeline for your convenience during the preliminary design stage.

Our pipeline varies in depth from 5-10 feet in the area you propose to cross, therefore, in order to avoid any possible conflicts, would you please review the following suggestions:

1. If any construction is contemplated in the immediate vicinity of the District's high pressure transmission main, potholing to verify main depth is recommended. Recent excavations have proven the dept of the main to vary up to one foot.

2. If any pipeline or other utility is designed to cross or parallel the District's main, maximize the distance between them. The District will not allow any other utility to come in contact with the transmission main.

3. If any construction activity (including potholing) is planned near the district's main, please insert the following note on the appropriate drawings: "Contractor shall notify San Gabriel Valley Municipal Water District, Mr. Bob Stallings or Mr. Pete Wood at (818) 969-7911, 48 hours before commencing construction."

4. The District would appreciate prior notification of any pre-construction conferences in order that a District representative may attend.

1-1

RESPONSE TO LETTER 1:

1-1 Comment noted. The pipeline company will need to provide notice of its proposed construction activities to local agencies in advance. Local agencies will also be provided additional information on construction details and scheduling prior to commencing construction. Information as provided by the Water District will be incorporated into further engineering design that will be undertaken.

COMMENT LETTER 1:
SAN GABRIEL MUNICIPAL WATER DISTRICT

Upon completing any preliminary construction plans, please send us two (2) sets of each for our review. We realize that we are asking for quite a bit at this time, but our past experiences have shown that now is the time to resolve any potential problems. 1-2

The District provides as-built plans of its facilities as a courtesy. This measure is intended to promote cooperation between the parties involved and to avoid construction conflicts. The location of other utilities shown on the District's plans should not be relied upon. The location of the District's facilities should be field verified. Please be advised the District strongly protects its prior rights to the location of its facilities. 1-3

I have high-lighted the area on your drawing (page 13) where the proposed crossing will take place.

Sincerely,

Peter M. Wood
Technical Management Assistant

PMW:lf

Enclosure

Please address all correspondence to:

Bob L. Stallings, General Manager
San Gabriel Valley Municipal Water District
P O Box 1299
Azusa, CA 91702-1299

RESPONSE TO LETTER 1:

1-2 Comment noted. Construction plans will be forwarded to the district when available.

1-3 Comment noted.

COMMENT LETTER 2: DR. H.G. WILSHIRE

Bureau of Land Management
ATTN: Stephen L. Johnson
6221 Box Springs Blvd.
Riverside, CA 92507-0714

Following are my comments on the DEIS/R for the proposed Cajon Pipeline project, based on review of that document and studies of the Mojave, Kern River, and All American Pipelines (Wilshire, 1992).

(1) There appear to be major structural flaws in the review procedure which effectively preclude informed review of likely impacts of the proposed project. On p. 3-25 (and elsewhere) it is stated that the construction ROW will be 70 feet wide, with "additional work space...necessary for staging, storage, and off-loading areas." Experience with the All American, Mojave, and Kern River Pipelines (Wilshire, 1992) has shown that much greater widths of the construction ROW than the nominal value given in documents put out for public review are routinely approved through the agency of the Construction, Operation, and Maintenance Plans (COM Plan). The COM Plan lays out in sufficient detail for construction firm bids the actual areas deemed to be needed for construction in areas of difficult terrain or materials as well as in more typical areas. These figures always involve much larger overall areas of impact than the public is led to believe from the DEIS/S and FEIS/S documents. And, upon approval by the responsible agencies, the COM Plan becomes part of the ROW Grant. Failure to include such information in the documents submitted for public review may constitute violation of NEPA and CEQA regulations. 2-1

The nominal width rather than the true planned width (itself commonly violated in the actual construction process on the All American, Mojave, and Kern River Pipelines; Wilshire, 1992) is used to state areas of removal of native plant communities (p. 5.3-3). Such estimates are so far removed from reality as to be misleading.

(2) The assessments leading to selection of the Bureau's Preferred Alternative appear to be multiply flawed:

On p. 6-6, it is stated

If only long-term impacts were considered, the M-70 Pipeline, the Cajon Pipeline and the Four Corners Line 90 Pipeline would be ranked one, two, and three with respect to their desirability from an environmental point-of-view. Introducing short-term construction impacts into the equation favors the Four Corners Line 90 Pipeline..." "Thus, the overall ranking might be the M-70 Pipeline first, followed in second place by the approximately equal Cajon and Four Corners Line 90 Pipelines. 2-2

Table 6-1, assessment of long-term impacts in 3 categories appears to contradict the first sentence of the above statement in assigning "Low" impact in all 3 categories to the Four Corners Line 90 Pipeline. Moreover, long-term (> 50 years) impacts to habitat in Joshua Tree woodlands and to visual quality are likely (Wilshire, 1992). The appropriate evaluation of these impacts would be "High" for the Cajon and Pacific Pipelines, "Moderate" for the M-70 Pipeline, and "Low" for the Four Corners Line 90 Pipeline. 2-3

RESPONSE TO LETTER 2:

2-1 As stated in Section 3.2.3, the 70-foot wide construction work zone includes the trench and work space, a vehicle passing lane and a stockpile zone. Staging and storage areas will be located within the 20-acres at 12-Gauge Lake, and within urban areas at Adelanto and Fontana. No staging areas would be located within the San Bernardino National Forest boundaries.
Additional work spaces are commonly required as the commentor states, usually for equipment lay down and additional spacing for manoeuvering of construction equipment. The exact location of these additional areas cannot be identified until further engineering design is undertaken. Staging areas are presently anticipated to be provided within the tank farm site and urban areas. Any further attempts to determine the additional areas at this time is speculative.

Impact 5.3.1-3 and 5.3.1-4 identifies the significance of loss of native plant communities. Mitigation measures have been proposed to limit the loss of additional native habitat and to undertake revegetation after construction.

2-2 The Risk of Spill for the Four Corners Line 90 alternative should be High not Low. Table 6-1 has been corrected in the Final EIS/EIR.

2-3 Impacts to Joshua tree woodland and visual quality are addressed in Sections 5.3 and 5.6 of the Draft EIS/EIR. Mitigation measures for revegetation and Joshua tree relocation have been recommended to reduce these impacts to a less-than-significant level. Mitigation measures in Section 5.6 recommend the avoidance of Joshua trees and relocation as close to their original position as possible. As stated on page 6-4 of the Draft EIS/EIR, none of the alternatives are likely to have long-term adverse effects on biologic or visual resources.

COMMENT LETTER 2:
DR. H.G. WILSHIRE

Further on p. 6-6, it is stated,

> *If fulfillment of the goals of the project is a criterion, then the picture changes. Neither the M-70 nor the Four Corners Line 90 Pipeline can deliver a maximum of 180,000 BPD of crude oil to the Los Angeles Basin. In fact, the M-70 and Four Corners Line 90 Pipelines...together could deliver approximately 130,000 BPD. Thus, the appropriate comparison should be between the environmental impacts of the Cajon Pipeline and the combined environmental impacts of the M-70 and Four Corners Line 90 Pipelines. Viewed in this light, the Cajon Pipeline becomes the environmentally superior alternative.*

2-4

The evaluations for long-term impacts in 3 categories (Table 6-1) for these 3 alternatives are: Four Corners Line 90: Low, Low, Low; M-70: Low, Low, Low; and Cajon: Low, Low, Low.

The evaluations for short-term impacts in 2 categories (Table 6-2) for these 3 alternatives are: Four Corners Line 90: Moderate, Moderate; M-70: High, Moderate; Cajon: High, Moderate. In the short-term impact assessment it is implied that 23.3 mi of new corridor in the M-70 alternative has the same impact as 142 mi of new corridor in the Cajon alternative.

On p. 3-33 it is stated that the M-70 line has a current capacity of 63,500 BPD, which presently is being upgraded to 95,000 BPD, and on p. 3-36 it is stated that the Four Corners Line 90 would be reversed to carry 95,000 BPD to the L.A. basin. The total of 190,000 BPD contradicts the statement quoted above that the two existing pipelines cannot meet project goals.

Thus, the conclusion that the "Cajon Pipeline becomes the environmentally superior alternative" appears to have no merit. Indeed, the facts presented indicate that the combination of the M-70 and Four Corners Line 90 Pipeline alternatives would have much lower long- and short-term environmental impacts than the Cajon alternative, and would meet project goals. Even if the combination does not immediately meet project goals, the potential long- and short-term environmental impacts of the Cajon alternative could appropriately be judged as counter-balancing.

It is further of interest to note that the All American Pipeline, which carries crude oil to west Texas, was justified on the grounds of an anticipated glut of oil on the west coast by 1990. The Cajon Pipeline is now justified on the basis of a shortage of crude oil needed to supply west coast refineries. It would not appear that either prognostication has a valid basis.

2-5

(3) Stated mitigation measures that would reduce significant to less-than-significant impact are not defensible in terms of experience with the All American Pipeline (1987) and the Kern River and Mojave Pipelines (1991). For example, such statements as:

- "Use of the ROW in creosote and saltbush scrub shall be limited to crushing when possible and shall be located adjacent to existing disturbance where feasible."
- "Areas disturbed by pipeline construction shall, to the maximum extent feasible, be regraded, imprinted and revegetated to restore their original appearance" (p. 5.6-3).

2-6

RESPONSE TO LETTER 2:

2-4 Table 6-1 has been corrected to reflect the Comment 2-2. The M-70 Pipeline alternative requires the replacement of the existing pipeline with a new 16-inch pipeline. Though in an existing pipeline corridor, pipeline construction for this alternative involves pipe trenching and laying of pipe for the entire 92 miles. Disruption of the earth and ground cover will be similar in manner to that which would occur in construction of the Cajon Pipeline project and would result in similar short-term impacts to the Cajon Pipeline.

The capacity of the Line 70 plus Four-Corners Line 90 has been corrected on page 6-6 to read 190,000 BPD. Due to the age of the pipeline, the spill risk for the Four Corners Line 90 is higher. (It cannot meet project goals because Line 70 runs full).

It was recognized that due to its shorter construction length that the M-70 Pipeline would be ranked number one. However, the M-70 Pipeline together with the Four Corners Pipeline would be required to achieve the same objective that is transportation of 180,000 BPD. The addition of a higher spill risk to this alternative does not result in lower short-term and long-term environmental impacts as compared to the proposed project.

2-5 The planning for the All-American Pipeline (AAPL) was undertaken prior to major production cutbacks occurring in the Santa Barbara region. Planning for each project cannot take into account unforeseen development in the petroleum industry, but must be based on present projections for oil production from existing fields.

2-6 Mitigation measures proposed within the Draft EIS/EIR are recommended with very serious intent. Implementation of the mitigation measures is the responsibility of the lead agencies, in this case, the U.S. Bureau of Land Management and the City of Adelanto. A mitigation measure shall be added to aid in mitigation measure implementation.

5.3.1-3(g) *A BLM field biologist or other qualified BLM person assigned by the Authorized Officer shall be present onsite during the initial ROW preparation to determine areas requiring minimal acceptable clearance procedures.*

COMMENT LETTER 2:
DR. H.G. WILSHIRE

"The pipeline route should avoid the removal of Joshua Trees. Joshua Trees that are removed should be replanted as close to their original locations as possible." (p. 5.6-3).

Experience with the Kern River and Mojave Pipelines (Wilshire, 1992) has shown that even mandatory language for environmental protection may be contradicted by agreements implied by acceptance of COM Plans, so permissive language has little credibility for implementation. For example, transplantation of Joshua trees, yucca, and cacti close to their original positions was a mandatory condition for construction of the Kern River and Mojave Pipelines. But, this condition was supplanted by a requirement agreed to in the COM Plan to transplant a total of 100 yuccas and 100 cacti in each of the two pipelines in the entire State of California. Even the minimal requirement was not met on either pipeline. It does not appear, therefore, that the mitigations are stated with any serious intent to implement them.

SUMMARY

The procedures followed in presenting potential environmental impacts of the proposed project are seriously flawed and misrepresent the true impacts likely to be incurred, and may, therefore, violate both NEPA and CEQA. The assessment of alternatives avoids a meaningful discussion of the need for the stated project goals to be met, and misrepresents the benefits that might be achieved from a combination of alternatives. 2-7

It is recommended that the DEIR/S be completely redone to provide objective assessments of potential impacts and alternatives.

Reference

Wilshire, H.G., 1992. Environmental impacts of pipeline corridors in the Mojave Desert, California: U.S. Geological Survey Open-file Report 92-447.

H.G. Wilshire
Dr. H.G. Wilshire
1348 Isabelle Ave.
Mtn. View, CA 94040

RESPONSE TO LETTER 2:

Mitigation Measure 5.3.1-3(f) shall be revised as follows:

5.3.1-3(f) Use of the ROW in creosote and saltbush scrub shall be limited to crushing where topography allows, and when no fill or excavation is required. Disturbances for individual activities, such as lay-down, maintenance, etc., shall be located adjacent to each other within the ROW to minimize concentrated disturbances.

2-7 In preparation of this document, the EIS/EIR preparers have followed both CEQA and NEPA regulations. Your comments were taken into consideration and, where appropriate, were incorporated into the Final EIS/EIR pursuant to CEQA and NEPA.

COMMENT LETTER 3:
STATE FIRE MARSHALL

STATE OF CALIFORNIA · STATE AND CONSUMER SERVICES AGENCY

PETE WILSON, Governor

STATE FIRE MARSHAL
PIPELINE SAFETY DIVISION
7171 BOWRON DRIVE, SUITE 400
SACRAMENTO, CA 95823-2234

(916) 262-1937
CALNET 8-460-1937

STATE FIRE MARSHAL

RECEIVED
OPERATIONS AND MANAGEMENT

1992 NOV 13 PM 2:05

CALIF. WATER DISTRICT
RIVERSIDE, CA.

November 12, 1992

Stephen L. Johnson
Bureau of Land Management
6221 Box Springs Boulevard
Riverside, CA 92507-0714

Thank you for providing us with copies of the Draft Environmental Impact Statement/Environment Impact Report (EIS/EIR) for the proposed Cajon Pipeline Project and keeping this office updated on the status of the project.

As a follow up to our meeting of November 10 in which we discussed our safety jurisdiction over the construction of the Cajon pipeline as well as operation and maintenance after it is completed.

As you know the California Pipeline Safety Act of 1981 (CAPSA) vests our office with exclusive safety regulatory and enforcement authority over intrastate pipelines which are used for the transportation of hazardous liquids namely crude oil.

The pipeline construction, operation, and maintenance requirements are contained in Title 49 of the Code of Federal Regulations (CFR) which the state has adopted.

Since Cajon pipeline is classified as an intrastate pipeline, to ensure compliance with pipeline safety regulations, the proposed construction of the said pipeline will be subject to continuous inspection by our field engineering staff. After the new pipeline is put into service, its operation and maintenance will additionally be subject to periodic comprehensive inspection. 3-1

We will attend the public hearings scheduled the first week in December 1992 and will be present to answer any questions posed by the members of the public and city officials regarding safety of the proposed pipeline.

FAX (916) 262-1943
ICimb (Network - SFMCA

TELECOMMUNICATION DEVICE FOR THE DEAF (916) 262-1

RESPONSE TO LETTER 3:

3-1 Detailed comments have been received from the State Fire Marshal. Please refer to response to Letter 20.

COMMENT LETTER 3:
STATE FIRE MARSHALL

Bureau of Land Management
Page Two

Our detailed comments will follow after we review the (EIS/EIR) provided by you. Those comments will only address pipeline safety related matters.

If you have any comments or questions please call me at (818) 337-9999.

CHARLES J. SAMO, Supervising
Pipeline Safety Engineer

CJS:js

RESPONSE TO LETTER 3:

COMMENT LETTER 4:
CALIFORNIA DEPARTMENT OF TRANSPORTATION

STATE OF CALIFORNIA—BUSINESS AND TRANSPORTATION AGENCY

PETE WILSON, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, 120 SO. SPRING ST.
LOS ANGELES, CA 90012
(213) 897-3656

RECEIVED
BUREAU OF LAND MANAGEMENT
1992 NOV 25 PM 1:45
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

November 12, 1992

Mr. Stephen L. Johnson
Bureau of Land Management
6221 Box Springs Boulevard
Riverside, CA 92507-0714

IGR/CEQA 11002
City of Adelanto
PipelineInstallation
for Crud Oil
Vic.LA-405/5-7.2/8.1

Dear Mr. Johnson:

We have reviewed the above referenced document in regards to installation of a 142-mile pipeline form 27 miles west of Barstow to the Los Angeles crude oil terminals in the Cities of Carson and Long Beach.

Based on the information received, we find no apparent impact on the State transportation system at this time, however any encroachment within State right-of-way will require a Caltrans Encroachment Permit. Attached for your convenience are the Standard Encroachment Permit Application and instructions, questions regarding the permit process should be directed to Mr. Ralph Capmany at (213) 897-3631. 4-1

Should you have any questions in regards to this response please call me at (213) 897-1338.

Sincerely,

Wilford Melton

WILFORD MELTON
Senior Transportation Planner
IGR/CEQA Coordinator
Advance Planning Branch

Attachments: Permit application and instructions

JP

RESPONSE TO LETTER 4:

4-1 Comment noted. No response required.

COMMENT LETTER 5:
BURL AND JOYCE HOSTETTER

RECEIVED
BUREAU OF LAND MANAGEMENT
'93 JUN 28 PM 1:31
DISTRICT MANAGER'S ASSISTANT
RIVERSIDE, CA

RECEIVED		
TO	DATE	INIT
DM	11/16	MCH
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SA MGR		✓
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SUB		
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CPS		
LEAD		
ILS		
NPS		
SA SUB	DATE	REPT

Burl E. and Joyce L. Hostetter
10311 Barada Rd
Phelan, CA 92371

November 13, 199

District Manager
Bureau of Land Management
6221 Box Springs Blvd.
Riverside, CA 92507-0714

SUBJECT: Cajon Pipeline

We have just read the unbelievable article on the Cajon Pass pipeline which is to run crude from the Santa Barbara Channels to the Los Angeles Basin. After referring to the map to make sure we were not losing our minds we still are too simple minded to see how it can be cost effective to run a pipeline clear out into the desert. It seems to be the same old story, don't bother the rich just dump it on the poor desert dwellers. It seems to us it would be cheaper to run a direct pipeline or build a refinery closer to the Santa Barbara Channels (if they don't already have one) rather than run all that pipe in a big loop to the L.A. Basin. 5-1

Doesn't anyone try to save money anymore or plan anything with economy and efficiency in mind. It seems to me that everyone in the Valley thinks the desert is a big dumping ground. Believe it or not there are people living on the desert who do not want everything dumped on them including this pipeline.

Sincerely,

Burl and Joyce Hostetter
BURL AND JOYCE HOSTETTER

RESPONSE TO LETTER 5:

5-1 The Cajon Pipeline will connect with the already existing All-American Pipeline north of Adelanto, and then transport the crude oil to the Los Angeles Basin. This route was selected due to the perception that this has less of an environmental impact than other routes assessed in the document—even less of an impact than the Pacific Pipeline which proposes a route directly from Santa Barbara to Los Angeles, and the M-70 Pipeline, which proposes a route through the Angeles National Forest. In addition, because the Cajon Pipeline route takes advantage of an already existing pipeline, the actual length of new pipeline construction is minimized, further lessening the environmental impact.

COMMENT LETTER 6:
CALIFORNIA NATIVE PLANT SOCIETY
BRISTLECONE CHAPTER

BRISTLECONE • CHAPTER

CNPS

DEDICATED TO THE PRESERVATION OF THE CALIFORNIA NATIVE FLORA

P.O. Box 330
Lone Pine CA. 93545
November 10, 1992

CA-17497
1792, 2880
(CA-360.3)

Bureau of Land Management
ATTN: Stephen L. Johnson
6221 Box Springs Blvd.
Riverside CA. 92507-0714

Dear People:

We have reviewed the DEIS/DEIR for the proposed Cajon Pipeline Project and offer these comments:

Page 2-3. 5.1.1-2(6) refers to "...the Erosion and Sedimentation Control Plan." (Emphasis omra). Where is it? It is not listed in the Index. Section 13.0 We would like to have the oportunity to comment upon the revegetation plan. We suppose the successful bidder will prepare it. — 6-1

Page 2-6. 5.1.1-4(a) states that the erosion and sedimentation control plan (ESCP) is "a component of the OSC plan"... What does OCS stand for? It is not listed in Section 10, Acronyms and Abbreviations. — 6-2

Page 2-6,7. 5.1.1-3(b) and 5.1.1-4(a) and (b) indicate contaminated soils will be removed. What will be used to replace them? Will they be suitable for revegetation efforts even with 6" of replaced topsoil? — 6-3

Page 2-8. 5.2.1-1(c) indicates that the ESCP shall be submitted to the appropriate governmental agencies for approval etc. The California Native Plant Society would like to review this plan before implementation. — 6-4

Page 2-9,10. 5.2.1-1(c)(ii) and (v)7 refer to "seeding". With what species of plant(s), grasses and also forbes? — 6-5

Page 2-10. 5.2.1-1(c)(v) and(vt) refer to "tree spading of mature species"... Any or all species and how big? A 2' diameter pine for instance? How is the hole where the mature tree was taken out treated (backfilled)? Does "nearby areas" mean inside or outside the ROW? — 6-6

Page 2-11. 5.2.1-1(c)(viii) refers to revegetation — presumably in accordance with the ESCP? — 6-7

Page 2-15. 5.3.1-3(a) is good. — 6-8

Page 2-16. 5.3.1-3(b) is good. — 6-9

5.3.1-3(c). You don't need 2 i in cacti (throughout this report). — 6-10

What disposal is made of Joshua Trees over 7'? — 6-11

5.3.1-3(d) is good. — 6-12

Page 2-17. 5.3.1-3(e). By rerouting around them? New route? Change ROW? — 6-13

5.3.1-3(f). We think we know what you mean!?! — 6-14

Page 2-27. 5.6.1-2(a) refers to revegetation — presumably in accordance with the ESCP? — 6-15

5.6.1-2(b). All Joshua Trees or only those 7' or less? — 6-16

RESPONSE TO LETTER 6:

6-1 The Erosion and Sedimentation Control Element is part of the Construction/Operation/Maintenance (COM) Plan, which will be prepared and approved prior to construction commencing. Refer to response to Comment 6-4.

6-2 The Oils Spill Contingency (OSC) Plan is described on page 3-14 of the Final EIS/EIR. The abbreviation has been added to Section 10, Acronyms and Abbreviations. The Erosion and Sediment Control Plan is more correctly a component of the COM Plan not the OSC Plan. The COM plan is described on page 3-11.

6-3 An additional mitigation measure has been added to ensure that soil used as fill is clean, similar to surrounding soils, and capable of supporting the existing vegetation. Please refer to mitigation measure 5.1.1-6 (d).

5.1.1-6 (d) *Soil that is to be used as fill must be clean, similar to surrounding soils, capable of supporting the existing vegetation and consistent with the requirements for fill as outlined within the Erosion and Sediment Control Element of the COM Plan. This element shall be reviewed by the Erosion and Sediment Review Committee.*

6-4 The Erosion and Sediment Control Element shall be reviewed by a committee consisting of experts selected from the BLM, USFS and the City of Adelanto. Please refer to Mitigation Measure 5.2.1-1(d).

5.2.1.-1(d) *An Erosion and Sediment Control Element shall be submitted as part of the COM Plan to the appropriate governmental agencies for approval by the project proponent prior to grading. The Erosion and Sediment Control Plan shall also be sent to the California Native Plant Society for additional comment prior to implemention.*

6-5 As described in Mitigation Measure 5.3.1-3(b), native species shall be used to revegetate disturbed areas. The list of species to be utilized on federal lands shall be reviewed and approved by the BLM, and on forest system lands by the USFS. Private lands will be returned to their previous condition.

COMMENT LETTER 6:
CALIFORNIA NATIVE PLANT SOCIETY
BRISTLECONE CHAPTER

RESPONSE TO LETTER 6:

6-6 Species for tree spading will be selected by the BLM and USFS dependent upon habitat, size of specimen and species type. Joshua trees up to 7 feet in height shall be relocated outside of the right-of way. Once the specimen is removed, the hole will be backfilled and treated in a manner as described in the Erosion and Sediment Control plan for backfilling. Specimens shall be taken from preferably undisturbed areas within the right-of-way but may necessarily be taken from outside of the right-of-way in selected instances within the forest service areas and with approval of the USFS.

6-7 Comment noted. Mitigation measures 5.2.1-1(d) (vii) has been reworded to ensure consistency with the Erosion and Sediment Control Element.

5.2.1-1(d)(vii) *Soil on graded slopes shall be revegetated in accordance with the Erosion and Sediment Control Element of the COM Plan and to the satisfaction of the Erosion and Sediment Control Review Committee as soon as possible following disruption.*

6-8 Comment noted. No response required.

6-9 Comment noted. No response required.

6-10 Comment noted. Corrections have been made to spelling of cacti.

6-11 Previous experience of pipeline construction has found that mature Joshua trees over 7 feet do not transplant successfully. The specimens that are not transplanted will be felled and left as "down dead trees" in areas to be revegetated. The felled trees will provide wildlife habitat and shade for establishing vegetation.

6-12 Comment noted. No response required.

6-13 Sensitive plant communities may include the microphytic community discussed in Mitigation Measure 5.3.1-4, or riparian habitat adjacent to streams in the Cajon Pass. Avoidance of such communities will require flagging of sensitive areas to ensure construction disturbance does not encroach upon the sensitive area and monitoring to ensure that these areas have been avoided. It is not anticipated that such areas will require rerouting of the pipeline route.

COMMENT LETTER 6: CALIFORNIA NATIVE PLANT SOCIETY BRISTLECONE CHAPTER

Page 4.3-19. Under "Sensitive Species Found on the Pipeline Route" *Syntrichopappus fremontii* is cited but it is not listed on Page 4.3-3 under "Plants" in Table 4.3.1-1. Did you mean "*lemmonii*" as *fremontii* is not believed to be sensitive by CNPS. 6-17

Pages 4.3-36,37. Under "Sensitive Plant Species" many plants listed are not identified by scientific name as they should be. Please add. 6-18

Page 5.3-1 to 5.3-11. Comments made above in re the erosion and sedimentation control plan, vegetation, seeding, tree spading, etc. also applies to all applicable mitigation measures in this Section. 6-19

Pages 5.3-4,5. In addition, we must emphasize that your discussion of Impact 5.3.1-3 does not really make it clear that the potential loss of 20± acres of Mojave spinaflower habitat would quite likely be significant in light of your statement that its "habitat is declining at an alarming rate."

And this prompts us to comment upon the generally-used statement for all mitigation proposed that "Implementation of these mitigation measures would reduce this impact to a *less-than- significant level.*" (Underlined emphasis ours). You use this declarative statement in all cases. How can you be so positive? This reduces your credibility and causes us to judge that you are glossing over some impacts that may not be capable of significant mitigation. A softer approach, such as "should reduce", would be closer to the mark and more realistic, we believe. See your discussion for impact 5.2.1-5 and then your conclusion at the top of page 5.2-8 as compared to your discussion in the 2nd paragraph under Article 7.4 on page 7-3 for example. 6-20 6-21

Thank you for sending us this DEIS/DEIR for our review and comment. Please send the final correction sheets with your answers to all comments.

Sincerely,

Vincent Todor, Co-chair Conservation
Bristlecone Chapter
California Native Plant Society

RESPONSE TO LETTER 6:

6-14 Mitigation Measure 5.3.1-3(f) has been clarified and revised as follows:

5.3.1-3(f) Use of the ROW in creosote and saltbush scrub shall be limited to crushing where topography allows, and when no fill or excavation is required. Disturbances for individual activities, such as lay-down, maintenance, etc., shall be located adjacent to each other within the ROW to minimize concentrated disturbances.

6-15 Comment noted. Mitigation Measure 5.6.1-2(a) has been reworded to ensure consistency with the Erosion and Sediment Control Plan.

5.6.1-2(a) *Areas disturbed by pipeline construction shall, to the maximum extent feasible, be regraded, imprinted and revegetated to restore their original appearance in accordance with the Erosion and Sediment Control Element of the COM Plan and to the satisfaction of the Erosion and Sediment Control Review Committee.*

6-16 Joshua trees less than 7 feet in height shall be transplanted. This is reflected in Mitigation Measure 5.6.1-2(b).

5.6.1-2(b) *The pipeline route shall avoid the removal of Joshua trees through the minimization of disturbance within the ROW in areas of Joshua tree woodland. Joshua trees less than 7 feet in height that would be removed by grading shall be relocated outside the ROW. Plant relocations shall be identified by tagging of specimens prior to grading of the ROW.*

6-17 The reference on page 4.3-19 is incorrect. *Syntrichopappus lemonii* was found along the proposed route.

6-18 Scientific names have been added to pages 4.3-36 and 4.3-37.

6-19 Mitigation measures in Chapter 2 which were revised due to preceding comments have also been revised in Section 5.3.

COMMENT LETTER 6:
CALIFORNIA NATIVE PLANT SOCIETY
BRISTLECONE CHAPTER

RESPONSE TO LETTER 6:

6-20 The ecological significance of the microphytic community is not known. Habitat is declining and it is recognized as a significant impact. However, if disturbance of the habitat can be confined to a limited area, and given that it may respond well to minor disturbance, no significant impact is anticipated.

6-21 Comment noted. The phrasing at the end of each impacts and mitigation measures section was adopted for consistency purposes throughout the document. It is the opinion of the document preparer's that significant impacts would be reduced to a level of less-than-significant as stated.

COMMENT LETTER 7:
CALIFORNIA RESOURCES AGENCY

State of California THE RESOURCES AGENCY OF CALIFORNIA

M E M O R A N D U M

To: Mr. Douglas P. Wheeler
Secretary for Resources

Date: November 30, 1992

Mr. Stephen Johnson
U.S. Bureau of Land Management
62221 Box Springs Blvd.
Riverside CA 92507-0714

From: Department of Conservation
Governmental and Environmental Relations

Subject: Joint Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Cajon Pipeline Project, SCH # 91082007

The Department of Conservation's Division of Oil and Gas has reviewed the joint EIR/EIS for the proposed Cajon Pipeline Project and submits the following comments for your consideration.

The proposed pipeline route(s) pass areas of the Montebello and Wilmington oil fields. In the Montebello area, the route comes within close proximity to numerous plugged and abandoned, active, and inactive oil wells. 7-1

If the pipeline or any structure associated with the project is located over or in the proximity of a plugged and abandoned well, there is the possibility that the well may need to be plugged and abandoned to current Division specifications. Section 3208.1 of the Public Resources Code (PRC) authorizes the State Oil and Gas Supervisor to order the reabandonment of any plugged and abandoned well when construction of any structure over or in the proximity of the well could result in a hazard. The cost of reabandonment operations is the responsibility of the owner of the property upon which the structure will be located. 7-2

Under Section 3208.1 of the PRC, the reabandonment responsibilities of the owner/developer of a property upon which a structure will be located need extend no further than the property boundaries. If a well requiring reabandonment, however, is on an adjacent property and near the common property line, the Division recommends that the structure be set back sufficiently to allow future access to the well.

Furthermore, if any plugged and abandoned or unrecorded wells are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If damage to a plugged and abandoned well occurs or an unrecorded well is uncovered, the Division's district office in Long Beach must be contacted to obtain information on the requirements for and approval to perform remedial operations.

RESPONSE TO LETTER 7:

7-1 Comment noted. Information regarding mineral resources for the urban segment of the proposed Cajon Pipeline route was inadvertently omitted. This information has been added to the text on page 4.1-11.

7-2 Comment noted. The requirements for encountering of unplugged and abandoned wells has been added as mitigation measure. Please refer to Mitigation Measure 5.1.1-7 of the Final EIS/EIR.

5.1.1-7(a) *Prior to commencing construction, the Cajon Pipeline Company shall consult with the Department of Conservation, Division of Oil and Gas (DOG) for information on wells located within the pipeline right-of-way.*

5.1.1-7(b) *If the pipeline is located over or in proximity to (that is within the ROW or within 20 feet of ROW) of a plugged and abandoned well, then coordination shall be undertaken with the DOG to ensure that the well is correctly abandoned and does not require reabandonment.*

COMMENT LETTER 7:
CALIFORNIA RESOURCES AGENCY

Mr. Wheeler and Mr. Johnson
November 20, 1992
Page Two

Although the possibility for future problems from oil and gas wells that have been plugged and abandoned or reabandoned to the Division's current specifications are remote, we, nevertheless, suggest that a diligent effort be made to avoid building over any plugged and abandoned well. If construction over a plugged and abandoned well is unavoidable, we suggest that an adequate gas venting system be placed over the well.

Any idle wells within the project area should be plugged and abandoned unless adequate provisions are taken to ensure that operators have access to these wells.

To ensure proper review of building projects within the subject area, the Division has available an informational packet entitled, "Construction Project Site Review and Well Abandonment Procedure". The packet outlines the information that a project developer must submit to the Division for review. Developers should contact the local building department for a copy of the site review packet.

Prior to commencing operations, the project applicant should consult with the Division district office in Long Beach for information on the wells located in the project area. 7-3

The Division is mandated by Section 3106 of the PRC to supervise the drilling, operation, maintenance, and abandonment of wells for the purpose of preventing: (1) damage to life, health, property, and natural resources; (2) damage to underground and surface waters suitable for irrigation or domestic use; (3) loss of oil, gas, or reservoir energy; and (4) damage to oil and gas deposits by subsurface water and other causes. Furthermore, the PRC vests in the State Oil and Gas Supervisor the authority to regulate the manner of drilling, operation, maintenance, and abandonment of oil and gas wells so as to conserve, protect, and prevent waste of these resources, while at the same time encouraging operators to apply viable programs for the purpose of increasing the ultimate recovery of oil and gas. 7-4

The scope and content of information that is germane to the Division's responsibility are contained in Section 3000 et seq. of the Public Resources Code, and administrative regulations under Title 14, Chapter 4 of the California Code of Regulations.

If you have any questions, please feel free to contact Richard Corbaley at the Division district office in Long Beach. The address is 245 West Broadway, Suite 475, Long Beach, CA 90802; phone (310) 590-5311.

Deborah Herrmann
Environmental Program Coordinator

cc: Richard Corbaley, Division of Oil and Gas, Long Beach
Michael Stettner, Division of Oil and Gas, Sacramento

RESPONSE TO LETTER 7:

7-3 Comment noted. Prior to construction, the Cajon Pipeline Company shall contact and coordinate with the Department of Conservation concerning location of oil wells within the pipeline route. This requirement has been added to mitigation measures concerning oil wells in Section 5.1.

7-4 Comment noted.

COMMENT LETTER 8:
DARLENE BRIGEL

12-6-92

Dear Sir -

It's hard to believe that you are considering putting in a crude-oil pipe line in the area stated. Especially along Bally Mesa School. Surely, there can be a better plan. Anyone, but you, said that the 8-1
hearing was not published adequately. And, the man that was your representative said he "wasn't there to answer questions, just take comments"! Why not? This is unbelievable!

Darlene Brigel
P.O. Box 290940
Phelan, Ca 92329

RECEIVED
DEC 7 1992
BUREAU OF LAND MANAGEMENT
DESERT DISTRICT
1695 SPRUCE ST
RIVERSIDE, CA

RESPONSE TO LETTER 8:

8-1 The purpose of the EIS/EIR was to assess the environmental impacts of the proposal and its alternatives. The intent of the public meeting was to solicit input into the contents of the document. There will be an approval process which will provide additional opportunities to express your concerns regarding the merits of the projects. For further information regarding the approval process, please contact Mr. Steve Johnson, Project Manager, BLM, Desert Office, Riverside. The public hearing for the project were noticed pursuant to requirements of both the California Environmental Quality Act (CEQA) and the Bureau of Land Management Guidelines to NEPA.

COMMENT LETTER 9:
MRS. JOHN HOWARD

PO Box 401
Adelanto, Ca 92301
Dec. 7, 1992

RECEIVED
BUREAU OF LAND MANAGEMENT
1992 DEC -9 PM 2:47
VICTORVILLE, CA.

Stephen Johnson
U.S. DEPARTMENT OF INTERIOR
BUREAU OF LAND MANAGEMENT
6221 Box Springs Road
Riverside, Ca 92507

DISTRICT, DESERT DISTRICT

Re: Not-Oil Pipeline

Dear Mr Johnson:

No! No to another pipeline, especially this type. Select another alternative.

We have enough problems with the California line, especially where it lies beneath dirt roads that are constantly graded.

9-1

No! Your department and the City of Adelanto council & contractors to meet your legal requirement to publish the Adelanto meeting time & date in the Adelanto weekly. This publication is not #1, #2, or #3 circle of regional news in the Victor Valley area. The Victorville Daily Press is #1, the San Bernardino Sun & the L.A. Times fall in the #2 & #3 slots.

You can be assured that I will get this information to as many area property owners as I can, or you can offer another meeting, but this time be ethical & moral about it, not just legal.

Sincerely!
Mrs John Howard

9-2

RESPONSE TO LETTER 9:

9-1 Comment noted. No response required.

9-2 Refer to Comment 8-1.

COMMENT LETTER 10:
CALIFORNIA ARCHEOLOGICAL INVENTORY

California Archaeological Inventory

Regional Information Center

Mailing Address: Archaeological Information Center
UCLA Institute of Archaeology
Fowler Museum of Cultural History
Los Angeles, CA 90024-1510
Phone: (310) 825-7411 FAX: (310) 206-4723

Bureau of Land Management
Stephen L. Johnson
6221 Box Springs Blvd.
Riverside, CA 92507-0714

RE: Draft EIR/EIS Cajon Pipeline Project

Dear Mr. Johnson,

December 10, 1992

I received your request for review and comments for the Draft EIR/EIS Cajon Pipeline Project. Our office does not have copies the cultural resources reports relevant to this project. These reports are supposed to be filed with our office by the archaeologists conducting the work. I would like to review the project, but without these reports, I am unable to conduct a complete review. Please let me know why the archaeologists have not submitted their reports to our office and have a copy forwarded for our files and so I can respond to your request. I appreciate your time. Please do not hesitate to call if you have any questions. 10-1

Sincerely,

Lynn H. Gamble, Ph.D.
Coordinator

RESPONSE TO LETTER 10:

10-1 Comment noted. Archeological reports have been forwarded to this office.

COMMENT LETTER 11:
CALIFORNIA DEPARTMENT OF FISH AND GAME

STATE OF CALIFORNIA—THE RESOURCES AGENCY PETE WILSON, Governor

DEPARTMENT OF FISH AND GAME
330 GOLDEN SHORE, SUITE 50
LONG BEACH, CA 90802
(310) 590-5113

December 11, 1992

Mr. Stephen L. Johnson
Bureau of Land Management
6221 Box Springs Boulevard
Riverside, California 92507-0714

Dear Mr. Johnson:

The following comments are in response to the Cajon Pipeline Draft Environmental Impact Statement/Environmental Impact Report, State Clearinghouse #91082007. The proposed project will travel approximately 142 miles between 12-Gauge Lake, located 27 miles west of Barstow to the Los Angeles crude oil terminals in Carson and Long Beach. The pipeline will cross major waterways and impact various wildlife including the habitat in which they exist.

This document lists a variety of wildlife species, plant species and plant communities that have the potential to be affected by the development of this pipeline. What this document fails to do is illustrate the extent of these impacts. There are no estimates of the number of acres of the different habitat types that will be affected and there are no detailed maps illustrating the locations of sensitive species located within the proposed pipeline alignment and right of way. 11-1

Based on the information that is contained in this document, the Department disagrees with the conclusion that the stated impacts listed in Table 2-1 under Biological Resources can be mitigated from significant impacts to less than significant impacts with the proposed mitigation measures. 11-2

Diversion, obstruction of the natural flow, or changes in the bed, channel, or bank of any river, stream, or lake will require notification to the Department of Fish and Game as called for in the Fish and Game Code Section 1600 et. seq. Notification should be made after the project is certified by the lead agency. 11-3

This project has the potential to affect a variety of wildlife habitats that support state and federally listed rare, threatened, and endangered plant and animal species, and also 11-4

RESPONSE TO LETTER 11:

11-1 Pipeline construction could result in the removal of up to 630 acres of common native plant communities. Location of sensitive species have been indicated on route maps in Appendix A.

11-2 Comment noted.

11-3 Mitigation measures pertaining to stream crossings shall be amended to include the recommendations for obtaining a Streambed Alteration agreement. This is reflected in Mitigation Measure 5.2.1-1.

5.2.1-1(b) *The Cajon Pipeline Company shall be advised to seek early consultation with the Department of Fish and Game to obtain a Streambed Alteration Agreement under Section 1601 for construction activities across the following streams and washes -Fremont Wash, Crowder Canyon, Cleghorn Canyon, Cajon Creek, Sycamore Canyon, and Lytle Creek. Under this agreement any mitigation measures if any would be decided at the time of consultation.*

11-4 Comment noted. A Biological Evaluation/Assessment (BE/BA) has been prepared and submitted to the California Department of Fish and Game and U.S. Fish and Wildlife Service. The BE/BA prepared contains technical appendices for biological surveys undertaken in compilation of the EIS/EIR.

COMMENT LETTER 11:
CALIFORNIA DEPARTMENT OF FISH AND GAME

Mr. Steve Johnson
December 11, 1992
Page Two

plant and animal species of special concern to the State of California. Until further information is supplied to the Department with a reasonable amount of time to review such information, the Department recommends that the Draft Environmental Impact Statement/Environmental Impact Report not be certified. 11-4

Thank you for the opportunity to review and comment on this project. If you have any questions, please contact Mr. Curt Taucher of our Environmental Services Division at 330 Golden Shore, Suite 50, Long Beach, California 90802 or by telephone at 310) 590-5137.

Sincerely,

Fred Worthley
Regional Manager
Region 5

RESPONSE TO LETTER 11:

COMMENT LETTER 12:
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

STATE OF CALIFORNIA

PETE WILSON, Governor

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO, CA 95814

Dec 14, 1992

STEPHEN JOHNSON
U.S. BUREAU OF LAND MANAGEMENT
6221 BOX SPRINGS BOULEVARD
RIVERSIDE, CA 92507-0714

Subject: CAJON PIPELINE PROJECT
SCH # 91082007

Dear STEPHEN JOHNSON:

The State Clearinghouse has submitted the above named draft Environmental Impact Report (EIR) to selected state agencies for review. The review period is now closed and the comments from the responding agency(ies) is(are) enclosed. On the enclosed Notice of Completion form you will note that the Clearinghouse has checked the agencies that have commented. Please review the Notice of Completion to ensure that your comment package is complete. If the comment package is not in order, please notify the State Clearinghouse immediately. Remember to refer to the project's eight-digit State Clearinghouse number so that we may respond promptly.

Please note that Section 21104 of the California Public Resources Code required that: 12-1

"a responsible agency or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency."

Commenting agencies are also required by this section to support their comments with specific documentation. These comments are forwarde for your use in preparing your final EIR. Should you need more information or clarification, we recommend that you contact the commenting agency(ies).

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact Russell Colliau at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Christine Kinne

Christine Kinne
Acting Deputy Director, Permit Assistance

Enclosures

cc: Resources Agency

RESPONSE TO LETTER 12:

12-1 Comment noted.

COMMENT LETTER 13: CITY OF PARAMOUNT

CITY OF PARAMOUNT

Community Development
(310) 220-2036

ELVIRA AMARO
Mayor
MANUEL E. GUILLEN
Vice Mayor
ESTHER C. CALDWELL, Ed. D.
Councilmember
HENRY HARKEMA
Councilmember
GERALD A. MULROONEY
Councilmember

RECEIVED

December 14, 1992

Bureau of Land Management
ATTN: Stephen L. Johnson
6221 Box Springs Boulevard
Riverside, California 92507-0714

Dear Mr. Johnson:

The City of Paramount has reviewed the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the proposed Cajon Pipeline Project.

Because a portion of the proposed Pipeline will be constructed in the City of Paramount, we are greatly concerned about a number of the mitigation measures included in the Draft EIS/EIR. As you are aware, there are a number of very sensitive uses in the vicinity where the Pipeline will be located. These uses include Ralph C. Dills Park, which is located adjacent to the proposed Pipeline,Mark Keppel Elementary School, and three large residential neighborhoods situated to the north, south, and east of the proposed Pipeline.

Specifically, the proposed mitigation measures in Sections 5.6 and 5.7 of the Draft EIS/EIR, dealing with Visual Resources and Land Use, do not adequately address the visual and land deterioration that will occur as a consequence of the Pipeline construction. The City of Paramount requests that dense landscaping, to include trees, shrubs, ground cover and turf, be installed along the proposed Pipeline route, to act as a buffer to the park and residential neighborhoods which are adjacent to the Pipeline. We also request installation of a suitable barrier or pipeline encasement to protect these uses from any damage that would result from an oil spill. 13-1

In the event of an oil spill, the mitigation measure proposed in Section 5.7 . 105 (a) - the development of an oil spill contingency plan - does not deal with the need to obscure the negative visual effects of an oil spill from the park and residential uses. Nor does the 13-2

16400 Colorado Avenue • Paramount, California 90723-5050 • (310) 220-2000
Facsimiles: City Hall (310) 630-6731, Public Services Facility (310) 630-2713, Sheriff Substation (310) 220-2009

RESPONSE TO LETTER 13:

13-1 Since the pipeline would be located underground and the ground surface will be restored to its previous condition (including revegetation) after construction, it does not seem to serve any purpose to install additional landscaping to create a visual buffer. The pipeline will not be visible after construction has been completed. Additional landscaping could be considered for inclusion as part of the project in order to provide a benefit to residents and park users, but would not be required to mitigate a significant impact of the pipeline.

13-2 Since the adverse visual effects associated with an oil spill would only be temporary, they are not considered significant and, therefore, no mitigation has been proposed. The Oil Spill Contingency Plan will require that the spill be cleaned-up and the area reclaimed, thereby eliminating any long-term visual impacts. See previous response to Comment 13-1 with regard to creating a buffer between the pipeline and adjacent parks and residential uses.

COMMENT LETTER 13: CITY OF PARAMOUNT

Stephen L. Johnson
Bureau of Land Management
December 14, 1992 Page 2

mitigation measure in Section 5.8.1-5 -- prior to the removal of any trees along the pipeline route, a tree removal and planting plan shall be submitted to the local jurisdiction for approval -- address the necessity of creating a buffer between the Pipeline and the park and residential uses.

The installation of dense landscaping will ensure that the visual quality of the park and residential neighborhoods will be protected from an oil spill by obscuring the view of the Pipeline route. Also, dense landscaping will protect the park and residential uses from negative visual effects during maintenance and repair of the Pipeline.

Section 5.7.1-5 states that oil from a spill "could flow onto private property and could result in potentially significant impacts". The mitigation measure proposed - "the development of an oil spill contingency plan - does not address the contamination that will occur to the surrounding uses. the planting of dense landscaping along the Pipeline route and the construction of a pipeline enclosement, providing double protection, "will assure that contamination from an oil spill, and the consequent restriction of the utilization and enjoyment of the park and residential areas, will be minimized by restraining the flow of the oil. If encasing the pipeline is not acceptable, a visually aesthetic barrier should be constructed protecting the area. 13-3

Again, given the proximity of the proposed Pipeline to many sensitive land uses, the City of Paramount requests that the suggestions made in this letter be incorporated into the mitigation measures for the Final EIS/EIR.

If you have any questions, please contact me at (310) 220-2039.

CITY OF PARAMOUNT

Patrick H. West
DEPUTY CITY MANAGER/
COMMUNITY DEVELOPMENT DIRECTOR

JC:PHW:amc

RESPONSE TO LETTER 13:

13-3 The Oil Spill Contingency Plan will require that any spill be remediated and any contaminated materials, such as soil, be removed and properly disposed. Generally, along the urbanized portions of the pipeline route, spilled oil which reaches the surface for some reason will be contained in its flow by normal surface drainage improvements, such as curbs along city streets. In most circumstances, the pipeline would be located beneath city streets and, therefore, it is most likely that spilled oil would remain in the streets and not encroach on private property. During the engineering phase, uses which the City of Paramount views as sensitive should be brought to the attention of the Cajon Pipeline Company.

COMMENT LETTER 14:
SOUTHERN CALIFORNIA ASSOCIATION
OF GOVERNMENTS

RESPONSE TO LETTER 14:

SCAG
SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
818 West Seventh Street, 12th Floor • Los Angeles, California 90017-3435 ☎ (213) 236-1800 • FAX (213) 236-1825

RECEIVED

DEC 17 '92 11:19

DIST. DESERT DISTRICT
RIVERSIDE, CA.

December 14, 1992

Mr. Stephen L. Johnson
Bureau of Land Management
6221 Box Springs Blvd.
Riverside, CA 92507-0714

RE: Draft EIS/EIR for the Proposed Cajon Pipeline Project - SCAG No. I 9200221

Dear Mr. Johnson:

Thank you for submitting the Draft EIS/EIR for the Proposed Cajon Pipeline Project to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG assists cities, counties, and other agencies in reviewing projects and plans for consistency with the following Regional Plans: the Regional Housing Needs Assessment (RHNA), the Regional Mobility Plan (RMP), and Growth Management Plan (GMP), and for conformity with the relevant air quality measures of the Air Quality Management Plans (AQMP) for the South Coast and Southeast Desert Air Basins.

These comments on the Draft EIS/EIR are meant to provide guidance for considering the proposed project within the context of our regional goals and policies which are based in part upon state and federal mandates. While neither the project sponsor nor the lead agency is required to undertake the specific actions recommended by SCAG or other agencies through the Intergovernmental Review Process, there are requirements in state and federal laws for consistency with regional goals and plans.

If you have any questions about the attached comments, please contact Glenn Blossom (213) 236-1876.

Sincerely,

Eric H. Roth

ERIC H. ROTH
Manager, Intergovernmental Review
ER:GB

COMMENT LETTER 14: SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Mr. Stephen L. Johnson
December 14, 1992
Page 2

COMMENTS ON THE DRAFT EIS/EIR FOR THE PROPOSED CAJON PIPELINE PROJECT

PROJECT DESCRIPTION

The Cajon Pipeline Company proposes to build a 142-mile-long, 20-inch diameter insulated buried pipeline from 12-Gauge Lake, (27 miles west of Barstow), California, to the Los Angeles crude oil terminals in Carson and Long Beach. Crude oil from the Santa Barbara Channel and the San Joaquin Valley would be delivered to 12-Gauge Lake by the existing All-American Pipeline. From there it would be conveyed to the Los Angeles Basin by the proposed Cajon Pipeline. The Cajon Pipeline would have a maximum capacity of 180,000 barrels per day (BPD) but would be expected to operate at an average flow of 150,000 BPD. Two pump stations would be needed to move heated crude oil through the pipeline. One pump station, together with storage, would be located at 12-Gauge Lake. The other pump station, together with control and maintenance facilities, would be located at Adelanto.

REGIONAL PLAN POLICIES

There are certain goals and objectives or actions expressed in the Regional Mobility Plan which are particularly relevant to this project.

- o Goals. Among the goals of the RMP are the goals to:
  - Provide sufficient capacity for the transportation demands of people and goods given the adopted growth-management forecast.
  - Achieve an efficient balance among all modes, including new technologies.
  - Protect the environment and support the region's plans for managing air quality.
- o Objectives. Among the objectives of the RMP is the objective or action to facilitate goods movement through the encouragement of increased use of intermodal services.

PROJECT CONSISTENCY WITH LOCAL PLANS

The California Environmental Quality Act requires that EIRs discuss any inconsistencies between the proposed project or plan with the applicable local government general plans and regional plans (Section 15125 (b)). Furthermore, State Planning Law requires each local government in 14-1

scag
SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
818 W. Seventh Street, 12th Floor • Los Angeles, CA 90017-3435 □ (213) 236-1800 • FAX (213) 236-1825

RESPONSE TO LETTER 14:

14-1 Early consultation and the public review process has provided an opportunity for all cities along the route to comment on consistencies with local policies and ordinances. Cities have responded with information on local plans and policies. In addition, mitigation measure 5.8.1-1(b) has been included to ensure that local jurisdiction and agencies are contacted and coordinated with to ensure consistency.

5.8.1-1(b) *The alignment of the pipeline will be designed to minimize or avoid interference with plans, policies, and existing and planned infrastructure during its construction. All affected agencies will be consulted regarding the precise alignment of the pipeline within their respective jurisdictions in order to minimize or avoid interference with existing and planned infrastructure and public facilities.*

COMMENT LETTER 14: SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

California to have a general plan and this general plan must have a safety element. The safety element is the primary vehicle for identifying hazards that cities and counties must consider when making land use decisions. While the safety element focuses on identifying fire and geologic hazards, it may also address other locally relevant safety issues such as hazardous materials spills, power failure, and storm drainage. Accordingly, we recommend that the EIS/EIR for the Proposed Cajon Pipeline Project look carefully at the relation of the project to the local general plans, and the safety elements in particular, for each of the affected local jurisdictions through which the pipeline will traverse. The EIS/EIR should clearly identify any local policies, objectives or programs which are inconsistent with the project or visa-versa. If there are inconsistencies, an explanation of how such inconsistencies are to be overcome should be provided.

PROJECT CONSISTENCY WITH REGIONAL PLANS

Existing regional plans prepared by SCAG do not provide any detailed guidance for pipeline locational decisions. Although the Draft EIS/EIR for the project asserts that the environmental consequences of road tanker transport, rail transport and marine tanker transport are all more prone to accidents and spills than a pipeline, we do not have the ability to independently verify these assertions. If these assertions are in fact proven correct, the project would appear to be consistent, in concept, with the Regional Mobility Plan and other regional plans. 14-2

scag
southern california association of governments
818 W. Seventh Street,12th Floor • Los Angeles, CA 90017-3435 □ (213) 236-1800 • FAX (213) 236-1825

RESPONSE TO LETTER 14:

14-2 Comment noted.

COMMENT LETTER 15: CITY OF CARSON

CITY OF CARSON

December 15, 1992

Mr. Stephen L. Johnson
Bureau of Land Management
6221 Box Springs Boulevard
Riverside, CA 92507-0714

Dear Mr. Johnson:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement/ Environmental Impact Report (EIS/EIR) for the proposed Cajon Pipeline Project. The City of Carson has the following comments concerning this project:

- The route the pipeline takes through Carson is substantially different from the one proposed in the Notice of Preparation (NOP). The current route indicates that the pipeline would pass through a closed organic landfill. The site has not been remediated. The impacts of placing a pipeline under a landfill have not been addressed. 15-1
- The pipeline is proposed to be placed in the right of way of Carson Street and to cross Alameda Boulevard at the intersection of Carson Street. An overpass is currently being designed for the Carson Street/Alameda Street intersection. The location and construction timing of the pipeline in relation to the proposed construction of the overpass needs to be addressed. 15-2
- Table 4.10.1-1 lists Sepulveda Boulevard and the San Diego Freeway as being in Long Beach at the point that the pipeline crosses the street. According to the accompanying map (Map 26) the points of crossing are located in Carson. 15-3
- According to Map 26 the pipeline also crosses 223rd Street in Carson, however, this crossing is not listed on the table. 15-4

701 EAST CARSON STREET, P.O. BOX 6234, CARSON, CALIFORNIA 90749 • PHONE (310) 830-7600

RESPONSE TO LETTER 15:

15-1 Changes have occurred since the Notice of Preparation due to environmental review and further engineering review of the pipeline route. The Cajon Pipeline Company has amended the route to avoid the organic landfill mentioned. The new pipeline route would involve continuing south along the Alameda Street to the Dominguez Channel and then following the Dominguez Channel to the GATX Terminal. This change has been incorporated into the Final EIS/EIR.

15-2 Construction details of this nature have not yet been determined. Details of construction scheduling, detours, lane closures, restriping, and other measures required for construction at individual locations will be reviewed with local jurisdictions after the alignment has been finalized and construction plans have been prepared.

15-3 Table 4.10.1-1 has been revised to indicate that the pipeline crosses Sepulveda Boulevard and the San Diego Freeway in the city of Carson rather than the city of Long Beach.

15-4 The 223rd Street crossing has been added to Table 4.10.1-1.

15-5 Comment noted. A Transportation Management Plan is required by Mitigation Measure 5.10.1-1(a) to be approved by Lead and Cooperation Agencies. This mitigation measure has been revised to include approvals by affected local jurisdictions.

5.10.1-1(a) *The Transportation Management Element of the COM Plan shall be prepared to detail specific roadway construction information; signing for closures; and, public notification identifying location, scheduling and duration of construction spread. This management element shall also include necessary Traffic Control Plans as required by local jurisdictions through which the pipeline route passes. This element shall be finalized and approved by the Lead Agencies (BLM, USFS, and the City of Adelanto).*

15-6 Comment noted. Pipeline construction will attempt to comply with all feasible requirements of local jurisdictions. Mitigation measure 5.10.1-1(c) has been revised to reflect additional requirements that may be requested by individual municipalities or jurisdictions through which the pipeline passes.

COMMENT LETTER 15:
CITY OF CARSON

- A Traffic Control Plan must be approved by the Department of Engineering Services prior to any permits being issued. 15-5
- The Department of Engineering Services requires that during construction, Alameda Street northbound must have two lanes open prior to 8:00 AM and after 2:30 PM. Alameda Street southbound must have two lanes open prior to 8:00 AM and after 3:00 PM. 15-6
- The Department of Engineering Services requires that during construction, 223rd Street eastbound must have two lanes opened prior to 8:00 AM and after 2:00 PM. 223rd Street westbound must have two lanes opened prior to 8:30 AM and after 3:00 PM. 15-7
- The Department of Engineering Services requires that during construction, Sepulveda Boulevard must have two lanes opened eastbound after 2:30 PM. Sepulveda Boulevard westbound must have two lanes opened prior to 9:00 AM and after 1:45 PM. 15-8
- Traffic mitigations must include an agreement to slurry "half" of any longitudinally affected roadway between median and curb, including any left turn pocket on the pipeline side. 15-9
- Construction is not allowed in the City of Carson on Sundays and can not begin prior to 7 AM weekdays (5.7.1-4(a)). 15-10

If you have any questions on these comments, please call Chris Ketz at (310) 830-7600 extension 330.

Sincerely,

Patrick Brown,
Community Development Director

RESPONSE TO LETTER 15:

5.10.1.1-1(c) *Construction work on major roadways and through major signalized intersections shall be conducted in off-peak periods (the hours outside of weekday peak commute hours of 7:00 AM to 9:00 AM and 3:30 PM to 6:00 PM), except where the city has requested otherwise to alleviate traffic impacts.*

Details of construction scheduling, detours, lane closures, restriping, and other measures required for construction at individual locations will be reviewed with local jurisdictions after the alignment has been finalized and construction plans have been prepared.

15-7 See previous response.

15-8 See response to Comment 15-6 above.

15-9 See response to Comment 15-6 above.

15-10 Comment noted. Pipeline construction will comply with all feasible construction-related regulations of the local jurisdictions where construction activities will occur as stated in Mitigation Measure 5.5.1-1.

COMMENT LETTER 16:
UNITED STATES DEPARTMENT OF THE INTERIOR

United States Department of the Interior

MINERALS MANAGEMENT SERVICE
Pacific OCS Region
770 Paseo Camarillo
Camarillo, CA 93010-6064

TAKE PRIDE IN AMERICA

IN REPLY REFER TO: 7300

December 16, 1992

Bureau of Land Management
Attn: Stephen L. Johnson
6221 Box Springs Boulevard
Riverside, California 92507-0714

Dear Mr. Johnson:

Thank you for the opportunity to review the Draft Environmental Impact Statement for the proposed Cajon Pipeline. We have reviewed the draft document and do not have any specific comments at this time. We think it is important to note that shipping oil by pipeline is MMS's preferred alternative, where feasible, and when onshore corridors are available. 16-1

We look forward to receiving the Final EIS/EIR. Again thank you for the opportunity to comment.

Sincerely,

J. Lisle Reed
Regional Director, Pacific OCS Region

RESPONSE TO LETTER 16:

16-1 Comment noted. No response required.

COMMENT LETTER 17:
LOS ANGELES COUNTY, DEPARTMENT OF REGIONAL PLANNING

Los Angeles County
Department of Regional Planning

Director of Planning James E. Hartl, AICP

Deputy Director Frank Meneses

RECEIVED
1992 DEC 28 AM 9:16
DIST. DIRECT DISTRICT
RIVERSIDE, CA.

December 17, 1992

Mr. Stephen L. Johnson
Bureau of Land Management
6221 Box Springs Blvd.
Riverside, CA 92507-0714

SUBJECT: Draft EIR Cajon Pipeline

Dear Mr. Johnson:

Thank you for providing a copy of the above document for review by this department.

The proposed project is to build 142 miles of 20 inch diameter pipeline, and related facilities, to carry a maximum of 180,000 BPD of crude oil from Santa Barbara Channel and the San Joaquin Valley to the Los Angeles Basin. The only location in which the pipeline would traverse L.A. County unincorporated area would be in the North Whittier area, alongside the San Jose Creek and at its confluence with the San Gabriel River.

The Draft EIR appears to adequately disclose the characteristics of the project including system safety and reliability. The Draft EIR also discusses marketing alternatives including the Pacific Pipeline, the M-70 Pipeline, and the Four Corners Line 90.

There are no discretionary permits which are required from this Department however permits to construct within flood control right-of-ways will be required from the Los Angeles County Department of Public Works. The updated Oil Spill Contingency (OSC) Plan and Final EIR should be submitted at the time of application. 17-1

If you have any questions please call me at (213) 974-6461 Monday through Thursday 7:30 a.m. to 6:00 p.m. Our offices are closed on Fridays.

Very truly yours,

DEPARTMENT OF REGIONAL PLANNING
James E. Hartl, AICP
Director of Planning

Frank Meneses
Section Head
Impact Analysis

JEH:FM:pr

c: Mike Nagao (DPW)

320 West Temple Street Los Angeles, CA 90012 213 974 6411 FAX 213 626 0434

RESPONSE TO LETTER 17:

17-1 Comment noted. As stated in Mitigation Measure 5.2.1-2, the Cajon Pipeline Company shall coordinate with the U.S. Army Corps of Engineers, the San Bernardino County Flood Control District, Metropolitan Water District, and the Los Angeles County Department of Public Works to determine the location of existing facilities that may be affected by pipeline construction. Details of construction scheduling, the relationship with county facilities and other measures required for construction at individual locations will be reviewed with these agencies after the alignment has been finalized and construction plans have been prepared. The Oil Spill Contingency Plan is subject to review by the Engineering Response Review committee and approval by the BLM and is required to be submitted prior to operation. When available, the OSC Plan shall be reviewed with the County Department of Public Works.

COMMENT LETTER 18:
CITY OF ONTARIO

CITY OF ONTARIO

303 EAST "B" STREET CIVIC CENTER ONTARIO CALIFORNIA 91764-4196 (714) 986-[illegible] FAX (714) 391-[illegible]

December 24, 1992

Bureau of Land Management
Attn: Stephen L. Johnson
7221 Box Springs Blvd.
Riverside, CA 92507-0714

RE: Draft EIR/EIS Cajon Pipeline Project

Dear Mr. Johnson:

Thank you for the opportunity to review the draft EIR/EIS for the Cajon Pipeline project. The project consists of a proposal to deliver crude oil from the Santa Barbara Channel and the San Joaquin Valley to the GATX terminal in Carson, California. The mode of transport under this proposal is a 142 mile buried, insulated steel-welded pipe through the Cajon Pass with a capacity of 180,000 barrels per day (BPD). The proposed pipeline route traverses many jurisdictions including the City of Ontario.

We submit the following comments for your review and consideration.

Review of Impacts and Mitigation Measures

Impact 5.1.1-1 is considered significant and is very sensitive in light of the tremendous amount of recent seismic activity occurring in the area. Text on page 4.1-4 supports this point stating that "the San Andreas and San Jacinto fault zones pose a relatively high potential for future hazard..." Mitigation measures provided are argued to reduce this impact to a less than significant level. Are there any documented cases which you might reference which show the effectiveness of fault crossings per measure 5.1.1-1? Is there an earthquake intensity threshold at which the design could possibly fail? Would the impact be significant at that point? 18-1

Mitigation measure 5.1.1-1(d). Will copies of the contingency plans (and updates) be required to be delivered to the appropriate safety personnel of each jurisdiction which is traversed by the pipeline? 18-2

Impact 5.1.1-6 is described as a potentially significant impact. No mitigation measure is provided to require clean up and restoration of groundwater if groundwater contamination occurs. A mitigation measure should be provided to address this issue prior to the impact being considered less than significant due to mitigation. 18-3

RESPONSE TO LETTER 18:

18-1 A fault rupture is considered to be the greatest geologic hazard to pipelines. Significant ground shaking does not affect buried pipelines, as shown in the recent Landers and Big Bear quakes, and seismic activity where unknown faults were exposed. The pipelines in the area were not designed for seismic activity - and all have withstood the earthquakes and aftershocks.

Pipeline fault design minimizes the potential for rupture by aligning the pipeline to cross active or potentially active fault traces at close to right angles (60° - 85° in the direction that will place the pipe in tension [rather than compression] during faulting).

To mitigate the effects of fault activity, the flexibility of the pipeline can be increased. This would include "S" design (as done for thermal expansion and contraction) and the use of backfill in a "V" trench that has a very low shear strength. This will allow movement of the pipe within the trench and allow for expansion of the line.

A more ductile and high strength pipe metallurgy is proposed for the entire Cajon system. The proposed API 5LX60 pipe with a wall thickness of 0.344 inches may be sufficient, without further strengthening (increased wall thickness) subject to final engineering studies and individual fault design.

Sections of the pipeline can be isolated if a fault rupture would cause a pipeline leak or break. This would consist of remote controlled valves that are operated based on line sensors detecting ground shaking, loss of pressure or both.

San Andreas Fault/San Jacinto Fault

Where the fault is crossed (both proposed and alternate route), the pipeline alignment approaches the known active fault trace as near to the right angle as possible so that any potential damage will be minimized in the event of a fault rupture. The wall thickness of the pipe will be strengthened to 0.500 inches in the actual area of the fault.

A remote controlled gate valve is located up stream of the fault, a check valve down stream is not required as the elevation gradient flows away from the fault. Sensors will be provided at the fault crossing, so that in the event of ground shaking, pressure drop, pipe leak or rupture, the valve will be closed and the up stream pump stations will be shut down.

COMMENT LETTER 18: CITY OF ONTARIO

Bureau of Land Management
December 17, 1992
Page 2

Impact 5.2.1-5 is described as a significant impact. Mitigation of this impact is based upon a contingency plan which has not yet been developed. The EIR/EIS should include a mitigation measure which guarantees that the impact will be mitigated to a less than significant level. Other measures, which insure clean up and environmental restoration should be included within the final EIR/EIS and required as conditions of project approval. 18-4

Impact 5.3.1-2 is described as significant due to toxicity or damage to pipeline habitats should a spill or inadvertent discharge occur. Other mitigation measures including one which would provide for clean up and restoration of areas subjected to spills or inadvertent discharges, should be added before the impact is deemed less than significant. 18-5

Impact 5.3.1-11 should include a mitigation measure to provide for the pipeline owner's financial responsibility for any clean up on any private or public lands, and give the local governmental jurisdiction, in which clean up is to occur, final approval as to completeness of any such clean up. This would insure that all areas affected by leaks or ruptures, not just National Forest Lands, are restored to an adequate and environmentally safe condition. 18-6

Mitigation measure 5.5.1-1 does not address impact 5.5.1-1 but rather impact 5.5.1-2. 18-7

Impact 5.7.1-5 should include additional mitigation measures including a measure which makes it the pipeline owner's financial responsibility to clean up spills or discharges to the satisfaction of both the property owner and the jurisdiction in which the spill occurred. Otherwise, require compensation for property devaluation resulting from contamination and restriction of land use. 18-8

Impact 5.8.1-2. Collocation needs to be more thoroughly analyzed to cover the entire pipeline route and explained in draft EIR/EIS. Collocation may occur in areas which are not designated as utility corridors. 18-9

Impact 5.9.1-8 is not stated as an impact. We disagree that the project would not result in disruption of economics or social situations and events, particularly in the event of a rupture, spill or leak. The pipeline is portrayed as beneficial to cities economically and socially. However, economic and social benefits to most jurisdictions traversed by the pipeline are insignificant and indirect. At the same time, each individual jurisdiction is burdened with risks as well as safety and maintenance concerns. Impact 5.9.1-13 more accurately states the potential for the proposed project in relation to economic and social benefits to all cities along the pipeline route. 18-10

RESPONSE TO LETTER 18:

18-2 Yes. The contingency plans will be submitted to the local fire departments and other safety agencies along the route of the pipeline which would provide emergency response in the event of a spill.

18-3 Potential groundwater contamination can be avoided by immediate clean-up of the spill and removal of contaminated materials, such as saturated soil. Implementation of this mitigation measure would avoid groundwater contamination and, therefore, would reduce potential impacts to an insignificant level. Although the potential does exist for groundwater contamination as a result of a spill under certain conditions, appropriate response will reduce this risk to an acceptable level.

18-4 It is true that the final Oil Spill Contingency Plan has not yet been developed. Mitigation in the Draft EIS/EIR requires that such a plan be developed and approved before the pipeline becomes operational. The Oil Spill Contingency Plan must be approved by the BLM, as well as the U.S. Environmental Protection Agency and/or the Department of Transportation, Office of Pipeline Safety, and must conform to the requirements of the Oil Pollution Act of 1990. Conformance with these requirements will provide adequate procedures and assurances for spill clean-up, therefore, no additional mitigation is required.

18-5 Comment noted. Mitigation similar to that required for spill clean-up and post-construction land restoration has been added to specifically address possible leakage of fuel or lubricants from construction vehicles. The following mitigation measure will be included in the EIS/EIR:

5.3.1-2(b) Any soil contaminated by leakage of fuel or lubricants from construction vehicles shall be removed, treated, and disposed of in a registered landfill. The ground surface shall then be restored to its pre-construction condition, including revegetation, consistent with the Erosion and Sedimentation Control Element of the COM Plan.

COMMENT LETTER 18: CITY OF ONTARIO

Bureau of Land Management
December 17, 1992
Page 3

Impact 5.12.1-1 uses a projection of a maximum of 3 spills over the life of the project. What will be the maximum life of the project? As the project proposes to collocate with other pipelines and transportation facilities, does the projected maximum three spills include spills which result from outside sources (ie. other pipelines/transportation accidents, etc.)? 18-11

Mitigation measure 5.12.1-1(d) Spill containment and response. The project should include a condition to require plans, showing location of pipeline route and line depth along the route within each jurisdiction, be distributed to the appropriate safety officials for each jurisdiction and also require proper recordation of easements or ownership of property. If these measures are already required by the State Fire Marshall, please state that in the environmental document. 18-12

Page 5.13-5. Geology, soils and seismicity. This section does not discuss the cumulative impacts which the pipeline may have in association with geology, soil and seismicity. Simply, the draft EIR/EIS states that the project will not cause ground shaking in urban areas; however, this does not address the cumulative impact issue. Proximity of a structure to an earthquake fault does not necessarily determine the potential for damage to that structure. Groundwater levels, soil composition and geologic substructure are environmental factors which can influence the potential for structural damage and loss of life during a seismic event. Could the pipeline affect the environment in a seismic disturbance? 18-13

Page 5.13-5 Onshore Water Resources. Many of the cities along the proposed route use water resources from underground water basins. Potential risk of contamination to these areas is not included in the analysis of cumulative impacts to onshore water resources within the draft EIR/EIS. 18-14

Page 5.13-5. Do biological resources include human populations? Are there cumulative effects to these populations? 18-15

Page 5.13-6 Utilities. "With mitigation this issue is considered less than significant." Please reconsider cumulative impacts of multiple pipelines and transportation lines such as would occur in the west end of the City of Ontario adjacent to the Union Pacific Railroad right of way, other pipelines, and the transit center. 18-16

Page 6-4 6.2.13 System Safety and Reliability seems to justify the Pacific Pipeline route as the most reliable with the least risk for spill, making it the most environmentally superior alternative. 18-17

RESPONSE TO LETTER 18:

18-6 Financial responsibility for oil spill clean-up belongs to the pipeline owner. Per federal requirements, the Oil Spill Contingency Plan will contain provisions for the specific types of financial assurances which will be put in place to provide adequate funds for clean-up in the event of an oil spill. The pipeline owner's financial responsibility for clean-up would apply to all areas along the entire 142-mile length of the proposed pipeline route. Responsibility for overseeing the adequacy of clean-up efforts could belong to one of several government agencies or may be shared among multiple agencies depending on the circumstances of the spill. Some of the agencies which could potentially have certain responsibilities for evaluating the adequacy of clean-up include the Regional Water Quality Control Board, Department of Fish and Game, Air Quality Management District, Department of Health Services, and California Environmental Protection Agency. These and other agencies enforce various regulations pertaining to toxic spills. Overseeing the clean-up would probably be a collaborative effort among these agencies, with one agency designated as the lead agency to work with other responsible agencies to ensure that their respective regulations are satisfied. While it is unlikely that the City of Ontario would be given final authority to judge the completeness of the clean-up, the City could be one of the agencies to participate in the collaborative effort with other responsible agencies if the spill occurred within Ontario's city limit.

18-7 Comment noted. No mitigation measure is required for Impact 5.5.1-1. Mitigation Measure 5.5.1-1 will be moved and re-numbered to apply to Impact 5.5.1-2.

18-8 See response to Comment 18-6 above.

COMMENT LETTER 18: CITY OF ONTARIO

Bureau of Land Management
December 17, 1992
Page 4

Page 6-5, Table 6-1. It would be useful in understanding the analysis of severity of spill for the Pacific pipeline if you provide a detailed explanation in the text of why spill consequences are higher for the Pacific Pipeline compared to low for most of the other alternatives. 18-18

Page 6-6 second paragraph. This information conflicts with Section 6.2.13 (system safety and reliability). Section 6.2.13 infers that the Pacific Pipeline has the smallest spill risk, thus a smaller potential risk of oil contamination. However, it is eliminated from consideration.

Eliminating the Pacific Pipeline because it has the potential to spill into estuarine and marine environments gives the notion that features along the Cajon Pipeline route and other routes are less significant, environmentally, than those along the Pacific Pipeline route. This is the logic and basis for the indirect routing, ultimately exposing more area to potential hazards. 18-19

In finally selecting the environmentally superior alternative, a criterion of 180,000 BPD capacity was added, which eliminated all of the alternatives. This could indicate that the alternatives considered were not reasonable or adequate. It may be appropriate to objectively reevaluate the analysis and conclusion of the environmentally superior alternative in the draft EIR/EIS, or to consider other alternatives. 18-20

Page 6.6, last paragraph. What prevents the M-70 pipeline from being retro-fitted with 20 inch pipe (180,000 BPD capacity) as an alternative for appropriate comparison purposes. 18-21

Page 7.1. First Paragraph states "At the end of the operational life...all facilities would be removed..." Please confirm within the document what "all facilities" includes (ie. pump stations, storage areas, pipe, etc.) Does this statement constitute a condition of project approval? What is the anticipated operational life of the project? Will the restoration of land, following removal of these facilities, be to the satisfaction of the local government jurisdictions? 18-22

Project Alternatives

The Cajon alternative and Four Corners alternative cover 245 miles and 355 miles, respectively, inland to western and central San Bernardino County, effectively bypassing areas with public opposition. However, each of these routes is as environmentally significant as the shorter, more direct routes and significantly larger areas are exposed to potential environmental effects. 18-23

RESPONSE TO LETTER 18:

18-9 The hazard associated with locating the proposed pipeline adjacent to other pipelines or utility lines is addressed in Impact 5.8.1-1. Collocation wherever it occurs along the entire pipeline route has been identified as a potentially significant impact. As the alignment is being finalized and engineering design completed, it will be necessary to identify exact areas of collocation along the entire pipeline route. While collocation does increase the potential magnitude of hazard in the event of a rupture and fire in multiple pipelines, the placement of the Cajon Pipeline would not present any unusual hazard beyond that presented by existing pipelines. Collocation of various types of oil, gas, and fuel pipelines does not increase the risk of a rupture or catastrophic event occurring in that location, however, it does increase the potential severity of such an occurrence. This is because more than one line could be ruptured in a given location resulting in a larger spill, or a fire or explosion in one line could cause ignition of adjacent lines. The crude oil to be carried in the Cajon Pipeline is less volatile than natural gas or fuel pipelines and, since it will be a new pipeline of heavy construction, it would less subject to rupture than many existing lines. As described in the Draft EIS/EIR, the risk of more than one rupture of multiple lines at one location is very small, although certainly possible. The Draft EIS/EIR describes a number of safety measures which have been incorporated into the design and operation of the pipeline in order to further reduce the risk of ruptures and spills.

18-10 Impact 5.9.1-8 is meant to differ from Impact 5.9.1-13 by describing socioeconomics under normal operating conditions as opposed to potential impacts resulting from a pipeline spill. Impact 5.9.1-8 indicates that there would be no adverse socioeconomics impact caused by the pipeline during operations and there would actually be a minor beneficial impact resulting from construction employment opportunities and the payment of franchise fees to local agencies. The wording of Impact 5.9.1-8 in the EIS/EIR has been modified to clarify this point.

18-11 The current projected life of the proposed project is 30 years. The calculation of maximum number of spills is based on past accident frequencies, magnitude of spills, and miles of pipeline. The projected number of maximum spills over the life of the project takes into account spills from all causes, including transportation accidents and other external forces acting upon the pipeline. This is a statistical projection based upon available data on spills of all causes.

COMMENT LETTER 18: CITY OF ONTARIO

Bureau of Land Management
December 17, 1992
Page 5

If access were attained from the San Joaquin Valley, the Pacific Pipeline would be the most environmentally sound alternative in terms of distance. It is the most direct route and has the most amount of new pipe which should result in a minimum of leakage for the project. This alternative is nearly as direct as shipping, trucking or rail modes but provides the "safety" of pipeline transport.

Based upon Table 3-2 of the draft EIR/EIS the only alternative which can achieve the same goals of the Cajon Pipeline, (i.e. an equivalent maximum BPD capacity and access both the Santa Barbara Channel and San Joaquin Valley) is the Angeles Pipeline. Yet this alternative is not even considered in any detail in the environmental analysis. As you are aware, Section 15126(d) of the CEQA Guidelines requires that an EIR include "a range of reasonable alternatives to the project...or to the location of the project...which could feasibly obtain the objectives of the project." With that in mind, are there a sufficient number of reasonable alternatives provided? Maybe the EIR/EIS should consider proposals which involve an upgrade of existing pipelines with new 20 inch pipe located within the existing routes identified in the document.

The document is confusing in terms of its presentation of alternatives. Two sets of alternatives are presented in the document: 1) project alternatives and 2) market alternatives. The confusion is related to the terminology "market alternatives" which suggests that the analysis was based upon economic or political merits rather than consideration of environmental impacts. Which set of alternatives is provided in accordance with CEQA Guidelines 15126(d)? Are both sets of alternatives intended to address section 15126(d) of the CEQA Guidelines? 18-24

Figure 3-1(B) shows alternative routes which were considered but rejected. Alternative routes traverse the City of Ontario one along Philadelphia Avenue and the other along Riverside Drive. One of these two alternatives may have been a preferred environmental alternative but they were not adequately addressed or explained as to why they were rejected. Early in the Notice of Preparation stage of this project, it was indicated to our staff that the routing would occur south of the City of Ontario. That routing is preferable as much of the development there is rural in character, allowing for protection and control over future development. That early representation is not even presented as an alternative. 18-25

The current proposed alignment in the west end of Ontario runs parallel to two existing petroleum fuel pipelines and other sensitive land uses including a proposed transit center near downtown Ontario. The draft EIR/EIS for the Cajon Pipeline does not address the condition or safety of existing pipelines in close proximity to the proposed pipeline, nor can the project proponents or lead agency assure the public that other adjacent pipeline or railroad uses do not threaten the reliability of the Cajon Pipeline. It seems that the project's potential hazards would increase exponentially above that of a typical spill ratio, because of its close proximity to other pipelines which are beyond the control of the project proponent. 18-26

RESPONSE TO LETTER 18:

18-12 It is required that pipeline plans be provided to the safety officials of each affected jurisdiction. Proper recordation of easement and right-of-way ownership is also required.

18-13 The pipeline could affect the environment in the event of a significant seismic disturbance to the extent described in the Draft EIS/EIR (i.e., possible rupture of the pipeline resulting in an oil spill). There are no cumulative impacts associated with this risk other than the fact that existing pipelines are also subject to this risk and could also rupture and spill during a major seismic event. The commentor is correct in stating that proximity to a fault line is not the only factor which determines the likelihood of structural damage occurring from an earthquake.

18-14 Risk of contamination of groundwater basins from an oil spill is discussed in Section 5.2 of the Draft EIS/EIR. From a cumulative perspective, the project represents the introduction of one more pipeline traversing the region which carries a substance capable of contaminating groundwater resources. Cumulatively, the risk of groundwater contamination from a pipeline spill is therefore increased, however, this is considered to be a very remote possibility. The commentor is referred to Section 5.12 of the Draft EIS/EIR which describes pipeline accident rates and the degree of resultant damage.

18-15 Biological resources as discussed in the Draft EIS/EIR do not include human populations. There are no specific cumulative impacts on human populations other than increased risk of exposure to the adverse effects of an oil spill. However, the pipeline does not significantly increase the risk of an oil spill and, in fact, a pipeline would significantly decrease the possibility of a spill compared to continuing the practice of bringing crude oil into the Los Angeles Basin by rail, truck, or marine tanker.

18-16 See response to comment 18-9.

COMMENT LETTER 18: CITY OF ONTARIO

Bureau of Land Management
December 17, 1992
Page 4

It would be prudent and consistent with the intent of CEQA, for the lead agency to further analyze the alternative routes shown in Figure 3-1(B). The City of Ontario requests that alternative route segments traversing Ontario be thoroughly analyzed and discussed in the EIR/EIS so that a full review of environmental alternatives is provided. 18-27

Sensitive Uses

The draft EIR/EIS describes sensitive uses (Table 4.7) as they occur along the pipeline route. A buffer area of 1,500 feet was used in the draft EIR/EIS in locating sensitive uses.

Special Report 219 titled "Pipelines and Public Safety" includes a statement relating to the damage radius of pipelines and sensitive uses within close proximity to pipelines which reads as follows: "The American Petroleum Institute recently conducted an analysis of the damage radius of a sample of liquids pipeline accidents reported by member companies in response to congressional legislation proposed in 1987 (H.R. 262) that would have prohibited siting new pipelines within 150 feet of any residence, school, hospital, nursing home, correctional institution, or other permanently inhabited facility (Pg 67, Transportation Research Board Special Report 219-Pipelines and Public Safety). Based upon this report, we feel that existing residential uses should be acknowledged as sensitive uses. 18-28

We have prepared the attached exhibit showing land uses within 1,500 feet of the proposed routes to supplement your analysis. This exhibit shows all existing land uses within 1,500 feet of the pipeline route and helps to identify a great number of sensitive uses along the proposed routes including residential uses and other pipelines. We suggest that, while they may be compatible uses, railroad uses and other pipelines are sensitive with respect to the Cajon Pipeline. Railroad and pipeline uses may affect the reliability of the Cajon Pipeline or may be affected by construction or operation of the Cajon Pipeline.

The EIR only briefly discusses collocation. Cumulative impacts from railroad accidents, rupture of adjacent pipelines, and/or rupture of the Cajon Pipeline could result in cumulative significant impacts even with safety and mitigation measures in place. The EIR should acknowledge that this potential exists, especially when considering the most environmentally superior route. 18-29

Miscellaneous

Please describe or provide an illustration of "right of way markers" to be used for this project. Describe any difference between markers to be used in urban areas versus those used in rural areas. 18-30

Please explain why the 20 inch line proposed for the Cajon Pipeline has a capacity for 180,000 BPD while the Pacific Pipeline with the same diameter pipe would only have a capacity of 130,000 BPD? 18-31

RESPONSE TO LETTER 18:

18-17 The statement on page 6-4 of the Draft EIS/EIR stating that the "Overall spill risk for the Pacific Pipeline would be less than for the M-70 and Cajon pipelines because the total transport distance is less" is incorrect. The Pacific Pipeline would be 170 miles long compared to the 142-mile length of the Cajon Pipeline. In other regards, the spill risks for the Cajon and Pacific Pipelines are similar because they would both be new pipelines of similar design and construction. Spills along the Pacific Pipeline would present a greater hazard due to risk of impacting sensitive biological resources along the coast. The greater length of the Pacific Pipeline also increases the statistical possibility of spill occurrence.

18-18 Please see response to Comment 18-17.

18-19 Environmental features along the Cajon Pipeline route are not less significant than those along the Pacific Pipeline route, but they are less sensitive. The Cajon Pipeline would actually expose less area to hazards, due to its shorter length.

18-20 The transport of up to 180,000 BPD of crude oil is an objective of the project. A pipeline of lesser capacity could be considered as an alternative in order to lessen significant environmental impacts. Of the lesser-capacity alternatives considered in the EIS/EIR, only the M-70 pipeline may present impacts which are no more significant than the Cajon Pipeline. Additionally, the M-70 is currently running at capacity. While the Cajon Pipeline presents greater spill risk due its greater length, the M-70 pipeline runs through more mountainous terrain for a greater distance and, in doing so, has more stream crossings than the Cajon Pipeline. If the significance of impacts associated with the two pipelines is considered similar (although different in nature), then the primary criterion for distinguishing between the two projects is their ability to meet project objectives. Since only the Cajon Pipeline meets the capacity objective of the project, it was judged to be the environmentally superior alternative.

18-21 The M-70 has recently been rebuilt and is again operational. Therefore, removing the existing M-70 pipeline and replacing it with a larger capacity pipeline is probably not economically feasible.

COMMENT LETTER 18: CITY OF ONTARIO

Bureau of Land Management
December 17, 1992
Page 7

The draft EIR/EIS only addresses the transport of heavy crude oil. Other liquid petroleum materials transported through this pipeline could pose threats and environmental impacts far different from that of heavy crude oil. Will it be possible for the substance or materials which are proposed for transport to be changed at some future time? If so, which agency approves such a change and will additional environmental reviews be required prior to a change in material? 18-32

Technical appendices for the EIR/EIS should be included for distribution with the final EIR/EIS for a complete public review and examination. 18-33

The City of Ontario is concerned with the aesthetic impacts of the pipeline at river, flood control and other crossings. 18-34

The City of Ontario is obviously concerned about explosions, ruptures, and leakage resulting from: seismic occurrences, plane crashes, train derailments, or other causes. An analysis should be provided which includes an assessment of the likelihood and type of pipeline-related accidents which might reasonably be expected to occur in Ontario in a worst case scenario and the impact which such an incident may have on Ontario's emergency services. Specifically, what impact will the pipeline have on Ontario's emergency response system and capabilities? Will Ontario have the manpower and equipment to respond to any potential disaster resulting from pipeline explosion or rupture? Will Ontario's emergency response time be at a safe and acceptable level? 18-35

Comments from the Ontario Fire Safety Division include a suggestion that the owner/operator of the pipeline periodically provide training to local jurisdictions relating to pipeline emergency procedures. 18-36

As opposed to the BLM's utility corridor where a combination of utilities isolated in a corridor of land may minimize the natural environment to be affected, the route through Ontario is not designated as a utility corridor. Existing sensitive land uses adjacent to the route are not protected and, in fact, have the potential to be heavily impacted by the proposal. Local governments, preempted by state and federal government regulations, have very little to offer in protecting and mitigating property owners from pipeline impacts. Attempting to minimize accidents associated with pipelines, the Ontario City Council adopted setback policies for new development within the General Plan. 18-37

The City of Ontario General Plan includes policies related specifically to pipelines. Excerpts of the General Plan have been included for your information. Especially, note Policy 6.3 which requires new development to maximize building setbacks from existing pipelines and established pipeline routes, to a depth of no less than 50 feet. Whenever development which is proposed within 150 feet of petroleum pipelines, site plans must clearly show pipeline locations and all measures proposed to mitigate potential safety hazards. It would not be consistent with adopted City policy to locate a new pipeline closer to existing 18-38

RESPONSE TO LETTER 18:

18-22 It is the intention to remove all facilities, including pump stations and storage facilities, at the end of the 30-year life of the project. It is possible that approval could be granted before the project reaches the end of its life to retain certain facilities, such as storage, if they can be maintained in adequate condition and serve some useful purpose. At the current time, no such action is anticipated. After removal of all facilities, restoration of the land will occur to the satisfaction of agencies with regulating authority at that future date. To ensure adequate restoration of the land after pipeline facilities are removed, the following mitigation measure has been added to the EIS/EIR:

5.7.1-4(d) *When pipeline facilities are removed at the end of the pipeline's life, the ground surface shall be restored to its previous condition, including revegetation. In natural areas, native species appropriate to individual locations shall be utilized for revegetation.*

18-23 As stated in the response to Comment 18-19, environmental resources along the Cajon Pipeline are not less significant than those along the Pacific Pipeline route, but they are less sensitive. Also, since the Cajon Pipeline is 28 miles shorter than the Pacific Pipeline, it does not expose a larger area to potential adverse environmental effects (the Cajon Pipeline is 142 miles in length, not 245 miles in length). The directness of the Pacific Pipeline's route may make it an attractive alternative, but it should be noted that many of the marine and estuarine environments along the route of the Pacific Pipeline are very sensitive to impacts that would be caused by construction and possible oil spills. Even though the oil spill risk is small and certainly much less so compared to marine or rail tankering, there is a statistical likelihood that several spills will occur during the life of the pipeline.

Unfortunately, there are only a limited number of reasonable alternatives to the project at the current time. Alternatives capable of being analyzed were limited to recent or current proposals for transporting crude oil to the Los Angeles basin. Any other possible alternatives are too speculative to consider in the EIS/EIR because it is not known if they are truly realistic and feasible.

COMMENT LETTER 18: CITY OF ONTARIO

Bureau of Land Management
December 17, 1992
Page 5

land uses than these restrictions, effectively making existing land uses non-conforming.

The valve designated for milepost 92.1 on Mission Boulevard per Table 3.1 is not indicated on Map 16 of Appendix A. We assume that this is simply a map error, but we would like some clarification as to whether or not a valve will be installed at that location. 18-39

Table 4.7.1-1 shows mile posts for Rancho Cucamonga as 78-95 and for Ontario as 95-96. This should be corrected to be 78-85 for Rancho Cucamonga and 85-96 for Ontario. The table should also identify residential and commercial uses in the general and sensitive uses columns. 18-40

Table 5.12.1-4 identifies risks of public fatalities/injuries from the Cajon Pipeline. These estimates are based upon figures in Table 5.12.1-2 which were provided by the EPA. EPA figures show data from land crude pipeline spills between 1971 to 1975 and these figures are useful to determine probable spills over the life of a typical pipeline. However, the Cajon Pipeline EIR/EIS should address the worst case scenario for this specific project which seems to deal with many more environmental constraints than a typical pipeline. Worst case scenarios could include explosions, ruptures, remote sensor failures, etc. Under these conditions, much environmental damage could occur, far above that illustrated in Table 5.12.1-4. 18-41

In the event of a rupture, will it be possible for the linefill oil between safety valves to escape the pipeline? The projection of spills less than 50 BBLS is 70% of all projected spills, yet linefill within the pipeline is between 385 BBLS and 12,902 BBLS. If a spill occurs, how will the linefill be prevented from escaping the pipeline, other than closing valves. 18-42

If the remote sensors fail during a rupture, a large amount of oil (up to 123,000 BBLS) could be located in the pipe, as linefill, between mileposts 60 and 125. Gravity flow would allow all or most of that oil to escape at temperatures of between 140-160 degrees, which could cause serious and significant environmental impacts, especially short term impacts. While it appears that pipelines have a superior safety record, spill and accident scenarios should be further considered and acknowledged in the environmental documentation. 18-43

Conclusion

The proposed Cajon Pipeline route via the Cajon Pass is the preferred route of project proponents. It appears that this route provides a path of least resistance and greatest tolerance by the public as opposed to shorter, even environmentally superior alternatives. For instance, the alternative of using the "Los Padres/Angeles Pipelines" was not considered, nor analyzed in detail because "opposition to the Angeles Pipeline remains strong...." (Draft EIR/EIS, page 3-36). After reviewing the information provided in the EIR/EIS document it is our opinion, based upon the draft EIR/EIS, that the shortest and environmentally superior alternatives are the Angeles Pipeline route and the Pacific Pipeline route. 18-44

RESPONSE TO LETTER 18:

18-24 The discussion of both "market" and "project" alternatives was provided in order to present a broad discussion of possible alternatives. The lead agency for the NEPA portion of the document (the Bureau of Land Management) required only a very limited number of alternatives to be included for the EIS. The number of alternatives was expanded for the purposes of CEQA (the EIR portion of the document), thus resulting in division of alternatives into two types. It is the intent for all of the alternatives to be considered together for CEQA purposes.

18-25 Routes along Philadelphia Street were rejected due to large volumes of traffic as explained in Section 3.3.5.2. The route south of Ontario would be constructed along Riverside Drive - another major thoroughfare. First and State Streets in Pomona and Ontario presented an alternative which would result in less traffic impacts and disruption.

18-26 Hazards associated with collocation are discussed in section 5.8 of the Draft EIS/EIR. Increased hazard associated with the age and condition of existing pipelines is discussed in a general way in Section 5.12, "System Safety and Reliability." As stated in the EIS/EIR, older pipelines are more likely to be subject to leaks and rupture due to their age. A train accident or other major incident could result in the rupture and possible explosion of a pipeline. Collocation does not increase the risk of such an occurrence, but could increase the magnitude of any subsequent fire and explosion that may occur. The project proponents cannot provide a guarantee that a catastrophe of this nature will not occur. It is impossible to predict if such an incident will occur or where it may occur. Obviously, the risk of a train accident causing a pipeline rupture is only of concern where the pipeline crosses or runs adjacent to a railroad line. Risks also exist at other locations for other reasons. All that the EIS/EIR can indicate is that the chances of such an occurrence are very small and that the pipeline will be to designed to current standards in order to minimize risks. Section 5.12 also proposes mitigation to further minimize risks.

18-27 At this time, the lead agencies have determined that the alternatives presented in the EIS/EIR are adequate to meet the requirements of NEPA and CEQA. Any substantial variation to the proposed route will require additional environmental review.

COMMENT LETTER 18:
CITY OF ONTARIO

Bureau of Land Management
December 17, 1992
Page 3

We agree that the Cajon Pipeline is preferable to many other modes of transport. However, the conclusion of the EIR/EIS document arguing that the Cajon Pipeline route is the most superior environmental alternative is not convincing. More evidence to back up this argument should be given or another alternative should be selected which is supported by evidence in the record. 18-44

If you have any questions of the above concerns please contact Elliott Ellsworth of the Ontario Planning Department at (909)391-2506.

Sincerely,

ONTARIO PLANNING DEPARTMENT

Otto Kroutil
City Planner

OK:EE:jc

cc: G. Michael Milhiser, City Manager
Byron Ely, Development Director
Norm Priest, Community Economic Development Director
John Freiman, Deputy City Planner
Valerie McCowan, Senior Planner
Richard Dinkleman, Senior Supervising Civil Engineer
Bill Alexander, Captain Safety Division

Attachments

RESPONSE TO LETTER 18:

18-28 We understand the commentor's concern regarding the location of the pipeline in the vicinity of sensitive uses, including residential uses. It is acknowledged that any nearby residents would be exposed to a hazard in the event of a major pipeline rupture and explosion/fire. Although the pipeline complies with all applicable state and federal regulations regarding pipeline location, decision-makers will need to weigh the severity of potential impacts against the likelihood of occurrence.

In regard to collocation with railroads and other pipelines, the proposed pipeline conforms with all known regulations pertaining to this subject as well as accepted practices. As indicated above, the risks of locating the pipeline adjacent to railroads and existing pipelines is acknowledged. All of the alternatives considered have some degree of collocation hazard, especially the Pacific Pipeline which would run parallel to a railroad line for a considerable distance.

18-29 Please see the response to Comment 18-16. The EIS/EIR does acknowledge that the potential exists for increased hazard when locating a pipeline adjacent to other pipelines or railroads. Please see the responses to comments 18-26 and 18-28.

18-30 An illustration of the ROW markers is included in Section 3.

18-31 The capacity of the pipeline to transport crude oil is a function of hydraulics and pump station spacing, as well as pipe size and wall thickness. The Cajon Pipeline proposes to pump oil through the line at a design rate higher than the Pacific Pipeline, therefore it has a higher barrel-per-day capacity.

18-32 It is only proposed for the Cajon Pipeline to transport crude oil. Transport of any other substance is not planned or envisioned. Any change in the substance to be transported in the pipeline would need to be approved by the Public Utilities Commission or the Federal Energy Regulatory Commission, depending on whether the pipeline is determined to be an intra-state or inter-state facility. Additional environmental review would be required to consider approval of such a change. Refer to response to Comment 36-3.

18-33 Technical appendices are provided upon request. The technical appendices have been forwarded to the City of Ontario for review.

COMMENT LETTER 18:
CITY OF ONTARIO

RESPONSE TO LETTER 18:

18-34 The City's concern is noted. In all most cases, the pipeline would be buried beneath the crossings and would not create an aesthetic impact. This was not considered to be a potentially significant aesthetic impact.

18-35 In the event of a spill or fire/explosion, the city's emergency response personnel will be the first to respond, however, additional personnel and equipment would soon be dispatched to provide assistance. The Oil Spill Contingency Plan (described in sections 3.2 and 5.12 of the Draft EIS/EIR) will establish procedures for emergency response, including designation of responsibilities and a listing of additional manpower and equipment which would be dispatched to scene as part of standard response procedures. While in the event of a major rupture the city's emergency response alone may not be adequate, the Oil Spill Contingency Plan will provide for the level of emergency response needed. A major spill would be indicated by the pipeline's leak detection system in a matter of seconds.

18-36 The Oil Spill Contingency Plan will include provisions for educating the public and local agencies on procedures to be followed in the event of a pipeline rupture.

18-37 Comment noted. Please note that the likelihood of sensitive land uses being "heavily impacted" by the pipeline are very small.

18-38 Comment noted. It would seem that the city's policy is directed at the establishment of new uses near an existing pipeline, rather than the converse. By at least partially routing the pipeline along the alignment of existing pipelines, the proposed pipeline would seem to help avoid conflicts with the city's policy.

18-39 The block valve listed at M.P. 92.1 is shown on map 17 of Appendix A.

18-40 Comment noted. Table 4.7.1-1 has been revised.

18-41 The analysis undertaken for the Cajon Pipeline safety focused on the likely and most probable events which could result in pipeline failure. A "worst-case" scenario examines a situation in which a catastrophic event would result in major failure of many utilities. Construction of the proposed pipeline could add to the overall magnitude of such a disastrous event, but this does not increase the likelihood of its occurrence.

COMMENT LETTER 18:
CITY OF ONTARIO

RESPONSE TO LETTER 18:

18-42 Upon detecting a leak or rupture the system is closed down. Oil will be lost at the rupture or leak dependent upon its location between valves and in relation to the topography. Once a leak has occurred there is no other way to prevent oil loss other than the closing of valves to reduce the quantity of lost oil. The OSC Plan will include containment procedures for oil released to the ground or water and will also include pipeline repair measures.

18-43 Comment noted. However, the number of spill and accident scenarios which could be envisioned are numerous. It must be assumed that a leak can occur at any location along the 142-miles of pipeline. It would be speculative then to provide an analysis of various scenarios. For this reason, the probability of a spill occurring is assumed and mitigation measures have been provided first for prevention and then clean-up, should it occur.

18-44 The City's evaluation is noted. However, in regards to available alternatives please refer to response to Comment 18-23.

COMMENT LETTER 19:
SAN BERNARDINO COUNTY TRANSPORTATION/ FLOOD CONTROL DEPARTMENT

TRANSPORTATION/FLOOD CONTROL DEPARTMENT

COUNTY OF SAN BERNARDINO
PUBLIC WORKS GROUP

825 East Third Street • San Bernardino, CA 92415-0835 • (714) 387-2600
Fax No. (714) 387-1867

KEN A. MILLER
Director

December 21, 1992

United States Department of the Interior
Bureau of Land Management
6221 Box Springs Boulevard
Riverside, CA 92507-0714

Attention: Stephen L. Johnson

Re: Draft EIS/EIR

Dear Mr. Johnson:

The Department is in receipt of a copy of the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the proposed Cajon Pipeline Project.

Per your request, the Department has reviewed the draft EIS/EIR and offers the following comments.

1. All crossings within Flood Control District (District) fee owned right-of-way or easement will require a permit from the District. Any work within District easements will require approval from the underlying fee owner. 19-1

2. In addition to the permit, all parallel alignments within District right-of-way or easements will require a license agreement. 19-2

3. Pipeline must be designed with automatic shut-off mechanism to minimize the effects of pipe rupture. 19-3

4. Minimum depth of cover within District right-of-way or easement shall be determined during permit review and when construction plans are available. Each crossing shall be analyzed to determine adequate depth of cover during permit review. 19-4

5. The Permittee will be required to maintain an insurance policy naming the San Bernardino County Flood Control District and County of San Bernardino as additional insured for the life of the structure. 19-5

MARNE M. MAUPIN
County Administrative Officer
MICHAEL L. WALCH
Assistant Administrative Officer
Flood Control Engineer

Board of Supervisors
MARIANNA TURCO — First District
JON D. MIKELS — Second District
ROBERT L. HARMOCCK — Fifth District
BARBARA CRAM MCMAHAN — Third District
LARRY WALKER — Fourth District

RESPONSE TO LETTER 19:

19-1 Comment noted.

19-2 Comment noted.

19-3 The proposed pipeline system does include an automatic shut-off mechanism.

19-4 Comment noted.

19-5 Comment noted.

COMMENT LETTER 19:
SAN BERNARDINO COUNTY TRANSPORTATION/ FLOOD CONTROL DEPARTMENT

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
December 21, 1992
Page Two

6. The Permittee will be required to hold the District and County of San Bernardino harmless of all claims and all liabilities for injury to persons and damage to property arising from all activities under the District permit or license agreement. 19-6

7. The Permittee will be responsible for obtaining all applicable Federal, State and local permits and approvals and shall provide verifications showing that the proposed pipeline is in compliance with all applicable rules, regulations, laws, ordinances, codes, statutes or order of any governmental authority exercising authority over the activities under the District permit or license agreement. 19-7

8. District permits or license agreement will require that the Permittee be in conformance with all applicable Federal, State and local regulations throughout the life of the structure including when and if adjacent properties develop. 19-8

9. Soil disturbance in excess of 5 acres will require a NPDES permit. The Permittee will be required to pay all necessary fees associated with NPDES permit and provide a copy to the Department prior to start of any construction on this project. 19-9

10. Impact on traffic circulation may be underestimated by the assumption that two-way traffic can be maintained at all times during construction. Some of the impacted roads have 26-feet wide pavements on a prescriptive right-of-way. With a construction spread of 25-feet, it is difficult to see how the construction can be managed to maintain a two-way traffic. 19-10

11. Right-of-way markers proposed to indicate location of the facilities after construction may not be compatible with traffic signing. Location and type of the markers must be State approved. 19-11

12. Weekend construction may be accomodated by the Department at increased inspection costs. The report should indicate the level, pattern and characteristic of the weekend traffic and possible consequences of weekend construction. 19-12

13. A road improvement project is proposed for Baldy Mesa Road. Profile grades along the pipeline must be compatible with the proposed project. 19-13

14. County road encroachment permit will be required for construction within the County road right-of-way. 19-14

15. The proposed alignment appears to parallel the West State Street Storm Drain and may impact the existing or future design. In addition, numerous existing utilities are in place that may further complicate the situation. 19-15

16. The pipeline, where it crosses unhardened (earthen) channels, shall be encased and installed at extra depth to minimize chances for damage from Operations equipment in the event channel flowline degrades. 19-16

RESPONSE TO LETTER 19:

19-6 Comment noted.

19-7 Comment noted.

19-8 Comment noted.

19-9 Comment noted.

19-10 In some instances, it may be difficult to keep two travel lanes open during construction due to the narrow width of certain roadways which the pipeline is currently planned to be placed beneath. It will be necessary to work with each affected jurisdiction to evaluate alternatives for lane closures, restriping, and other temporary measures which would allow construction to take place while also permitting traffic to flow in each direction. It is the project's intent to keep two travel lanes open (at a minimum) at all times during project construction. However, this may have to be modified if it proves infeasible.

Mitigation measure 5.10.1-1(a) has been revised to include the submission of Traffic Control Plans as required by local jurisdictions. At county review of this plan, it would be possible to alleviate any foreseeable traffic problems by the recommendations stated above.

19-11 The pipeline markers will conform to the specifications of the Pipeline Safety Act, which specifies the size, type, materials, colors, locations, and message content of pipeline markers.

19-12 Comment noted. Consequences of weekend construction on local traffic will be evaluated in conjunction with each local municipality for individual construction locations. Traffic control plans will be developed as needed to minimize disruption to weekend traffic. At that time, traffic levels and characteristics will be analyzed for each location in order to formulate adequate traffic control plans. Refer to Mitigation Measure 5.10.1-1(a).

19-13 Comment noted. The profile grades for the Baldy Mesa Road improvement project will be taken into consideration in preparing the alignment and construction plans for the pipelines.

19-14 Comment noted. Table 1-2 in the Draft EIS/EIR indicates that a county road encroachment permit will be required.

COMMENT LETTER 19:
SAN BERNARDINO COUNTY TRANSPORTATION/ FLOOD CONTROL DEPARTMENT

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
December 21, 1992
Page Three

17. If, for any reason, it becomes necessary for the Department to locate the pipeline where it crosses under a District facility, it shall be the sole responsibility of the Permittee to perform any pothole operations. In addition, Permittee shall be required to place offset tie markers on levee bank with data to precisely locate the pipeline. 19-17

18. The Department recommends that a meeting be scheduled between the Permittee, Permitee's engineer and the Department during preliminary plan preparation to discuss Department concerns. 19-18

19. In addition to the comments stated herein, additional comments and/or recommendations may be necessary which cannot be determined from the draft EIS/EIR at this time and would have to be provided after improvement plans have been submitted to this office. 19-19

If you have any questions regarding the above, please contact the undersigned at (909) 387-2633.

Very truly yours,

William M. Collins

WILLIAM M. COLLINS, P.E., CHIEF
Field Engineering Division

WMC:KCE:eh
cc: R. Montes
K. Ekse
C. Chumroff
C. Fahlie

RESPONSE TO LETTER 19:

19-15 Comment noted. The locations of all existing and planned infrastructure locations, including storm drain improvements will be researched and taken into proper account in preparing plans for the construction of the proposed pipeline.

19-16 The pipeline project already proposes to incorporate the referenced design and construction techniques, including encasement and at required depth. Refer to Figure 3-9.

19-17 Comment noted.

19-18 Comment noted. Meetings will be scheduled with all agencies whose facilities may be affected by the proposed project.

19-19 Comment noted.

COMMENT LETTER 20:
CALIFORNIA STATE FIRE MARSHAL

RESPONSE TO LETTER 20:

STATE OF CALIFORNIA - STATE AND CONSUMER SERVICES AGENCY

PETE WILSON, Governor

STATE FIRE MARSHAL
PIPELINE SAFETY DIVISION
7171 BOWLING DRIVE, SUITE 600
SACRAMENTO, CA 95823-2234

(916) 262-1837
FAX/ATT 8-468-1837

STATE FIRE MARSHAL

RECEIVED
DEC 23 1992
BUREAU OF LAND MANAGEMENT
RIVERSIDE, CA

December 11, 1992

Stephen L. Johnson
Bureau of Land Management
6221 Box Springs Boulevard
Riverside, California 92507-0714

SUBJECT: CALIFORNIA STATE FIRE MARSHAL'S COMMENTS ON THE PROPOSED CAJON PIPELINE PROJECT.

Our Pipeline Safety staff has reviewed a copy of Cajon Pipeline Co., Ltd.'s above mentioned pipeline Draft of the Environmental Impact Report/Statement (DEIR/S). Enclosed herein please find our comments.

In reviewing the DEIR/S we found certain pipeline safety provisions addressed in that document which are directly related to the pipeline safety regulations which this office enforces. Our review of the mitigation measures pertain only to those provisions which involve pipeline safety. The result of the review did not show any mitigation measure in conflict with or less stringent than the California State Fire Marshal's (CSFM) pipeline safety regulations.

California Government Code, Chapter 5.5 section 51011(b) requires that any new pipeline on which the construction begins after January 1, 1990, shall be designed to accommodate the passage of instrumented internal inspection devices, and shall have leak mitigation and emergency response plans and equipment as the State Fire Marshal may require.

The leak detection or leak mitigation system for the new Cajon pipeline shall be approved by this Office before the pipeline is to be put into service.

The CSFM's Pipeline Safety regulations are minimum standards. Thus, the pipeline operator/owner may elect to adopt more stringent pipeline safety requirements in the design, construction, maintenance and operation of the Cajon pipeline.

FAX (916) 262-1842
RCalifo Network - EFMCA

TELECOMMUNICATION DEVICE FOR THE DEAF (916) 262-1890

COMMENT LETTER 20:
CALIFORNIA STATE FIRE MARSHAL

RESPONSE TO LETTER 20:

Bureau of Land Management
Page Two

If you have any questions regarding our comments, please contact Chuck Samo at (818) 337-9999.

JAMES WAIT, Division Chief
Pipeline Safety Division

JW:CJS:js
Enclosure

COMMENT LETTER 20: CALIFORNIA STATE FIRE MARSHAL

DECEMBER, 1992

CALIFORNIA STATE FIRE MARSHAL
PIPELINE SAFETY DIVISION

COMMENTS ON THE PROPOSED CAJON PIPELINE
ENVIRONMENTAL IMPACT REPORT/STATEMENT
(DEIR/S)

1. PIPELINE AND APPURTENANCES

We will follow up to ensure compliance on the design, construction, hydrostatic testing and operation and maintenance of the pipeline system. 20-1

2. CAJON TERMINAL

We will follow up to ensure compliance on the design, construction, operation and maintenance of the breakout tanks, buried station piping, and maintenance of any overpressure protective devices and other requirements regarding pump stations. 20-2

3. ADELANTO PUMP STATION AND MAINTENANCE CENTER

We will follow up on items mentioned above for the Cajon Terminal. In addition, leak detection for the pipeline system will have to be approved by the California State Fire Marshal. 20-3

4. PROJECT OPERATIONS

The Construction/Operation/Maintenance Plan (COM Plan) required for the proposed Cajon Pipeline is consistent with CSFM's pipeline regulations. 20-4

5. OIL SPILL CONTINGENCY PLAN

The Cajon Pipeline's Oil Spill Contingency Plan (OSC Plan) is consistent with CSFM and Part 195, Title 49 Code of Federal Regulations (CFR). We will ensure compliance specifically with California Government Codes 51015, 51018 and Part 195.50 to 195.54, Part 195.402 (e), Part 195.403, Part 195.408 and other applicable codes. 20-5

RESPONSE TO LETTER 20:

Comments received from the State Fire Marshal's confirm the consistency of the proposed project with California State Fire Marshal's pipeline safety regulations. To this end, the majority of the responses to comments from this letter do not require further response from the EIS/EIR preparers. During design, construction and operation, compliance will be further ensured by review and monitoring by the State Fire Marshal's Office.

20-1 Comment noted. No response required.

20-2 Comment noted. No response required.

20-3 Comment noted. No response required.

20-4 Comment noted. No response required.

20-5 Comment noted. No response required.

COMMENT LETTER 20:
CALIFORNIA STATE FIRE MARSHAL

Comments on the Proposed Cajon Pipeline
Page Two

6. ENVIRONMENTAL IMPACTS OF THE CAJON PIPELINE PROJECT--TABLE 2-1

5.1.1-1 Pipeline seismic design protection

CSFM COMMENT
Any design mitigation requirements shall meet Part 195.110 External Loads Code of Federal Regulations (CFR) Title 49. (a) Anticipated external loads (e.g.), earthquakes, vibration, thermal expansion and construction must be provided for in designing the pipeline system. In providing for expansion and flexibility, section 419 of ANSI B31.4 must be followed. 20-6

5.1.1-2 Potential instability of pipeline route due to steep slopes.

CSFM COMMENT
The mitigation measure is consistent with ANSI B31.4, Section 451.4 which requires maintenance of pipeline rights of way against landslides, washouts, and erosion. 20-7

5.1.1-3 Pipeline route crosses areas susceptible to liquefaction.

CSFM COMMENT
See above comments under 5.1.1-2. 20-8

5.2.1-5 A pipeline or pipeline tank leak or rupture could result in an oil spill and subsequent degradation of surface runoff by spilled crude oil.

CSFM COMMENT
(a) A satisfactory pipeline oil spill contingency plan can mitigate the amount of release. This is covered under Part 195.402 (e) Emergencies and the California Government Code 51015. 20-9

(b) Installation of remotely operated block valves and automatic check valves at Cajon Wash (M.P. 72) and at Etiwanda Creek (M.P. 80). This may be covered under Part 195.260 on Valve Location. 20-10

(c) We will be reviewing valve spacing for general compliance with requirement of Part 195. 20-11

RESPONSE TO LETTER 20:

20-6 Comment noted. No response required.

20-7 Comment noted. No response required.

20-8 Comment noted. No response required.

20-9 Comment noted. No response required.

20-10 Comment noted. No response required.

20-11 Comment noted. No response required.

COMMENT LETTER 20:
CALIFORNIA STATE FIRE MARSHAL

Comments on the Proposed Cajon Pipeline
Page Three

5.2.1-6 The pipeline could be exposed to scour and natural changes in the stream's channel morphology over its operational life.

CSFM COMMENT
Minimum requirements of cover over buried pipeline shall be met under Part 195.248. 20-12

7. UTILITIES

5.8.1-1 Pipeline excavation could accidentally damage and/or disrupt service of existing utility lines.

CSFM COMMENT
Mitigation is achieved by compliance with Assenbly Bill 73 which is California's Pipeline Damage Prevention Program. 20-13

8. SPILL PREVENTION

5.12.1-1 (b) i. The recommendations from geotechnical studies shall be implemented for proper pipeline design features in fault zones to accommodate potential ground movement.

CSFM COMMENT
Any design mitigation requirements shall meet Part 195.110 External Loads (a) Anticipated external loads (e.g.), earthquakes, vibration, thermal expansion and construction must be provided for in designing the pipeline system. In providing for expansion and flexibility, section 419 of ANSI B31.4 must be followed. 20-14

ii. Internal corrosion prevention techniques shall be implemented in accordance with the requirements of the California State Fire Marshal as part of pipeline maintenance procedures. Such activities may include routinely scheduled periodic pigging of the pipeline on a frequent basis to remove pockets of accumulated fluids that contribute to internal corrosion, such as hydrogen sulfide,

RESPONSE TO LETTER 20:

20-12 Comment noted. No response required.

20-13 Comment noted. No response required.

20-14 Comment noted. No response required.

COMMENT LETTER 20: CALIFORNIA STATE FIRE MARSHAL

Comments on the Proposed Cajon Pipeline
Page Four

carbon dioxide, water and other impurities, and/or introducing corrosion inhibitors into the crude stream periodically.

CSFM COMMENTS
Cajon pipeline will not be allowed to transport crude oil that would corrode the pipe or other components of its pipeline system, unless the company has investigated the corrosive effect of the hazardous liquid on the system, and has taken adequate steps to mitigate corrosion. If corrosion inhibitors are used to mitigate internal corrosion, the operator shall use inhibitors in sufficient quantity to protect the entire potentially affected portion of the system. 20-15

We will require the operator of the pipeline to inspect the new pipeline for internal corrosion (in compliance with internal corrosion regulations). Additionally, whenever any pipe is removed from the new pipeline for any reason, the operator must inspect the internal surface for evidence of corrosion. The operator is required to maintain records of this for inspection by our field engineers.

iii. The pipeline will be concrete coated at crossings of Cajon Wash (M.P. 72), Etiwanda Creek (M.P. 80.1), Los Angeles River (M.P. 135.7), and San Jose Creek (M.P. 119.1-117.2).

CSFM COMMENTS
Our present regulations do not directly address this problem but it is covered by Part 195.110 External Loads. 20-16

9. ADDITIONAL CSFM COMMENTS

(a) Valve Location

The pipeline conforms to Part 195.260 (f) on Valve Location. Valves shall be located on each side of a reservoir holding water for human consumption. Additonally, valve spacing will be reviewed for general compliance. 20-17

(b) Pressure Testing

The new pipeline will be required to comply with Chapter 5.5 Sections 51014, 51014.3, and 51014.5 (Periodic Pressure Testing) of the California Government Code which specify in detail the manner of conducting the test, notification and observation of tests, and test reports. 20-18

RESPONSE TO LETTER 20:

20-15 Comment noted. Requirements pertaining to inspection and record keeping have been added to mitigation measure 5.12.1-1(b) ii.

5.12.1-1(b) ii *Internal corrosion prevention techniques shall be implemented in accordance with the requirements of the California State Fire Marshal as part of pipeline maintenance procedures. Such activities may include routinely scheduled periodic pigging of the pipeline on a frequent basis to remove pockets of accumulated fluids that contribute to internal corrosion, such as hydrogen sulfide, carbon dioxide, water and other impurities, or introducing corrosion inhibitors into the crude stream periodically in sufficient quantities to protect the entire potentially affected portion of the system, inspection of the internal surface for corrosion of any pipe removed from the pipeline for any reason, and maintenance of records of this inspection by State Fire Marshal's field engineers.*

20-16 Comment noted. No response required.

20-17 Comment noted. No response required.

20-18 Comment noted. No response required.

COMMENT LETTER 20:
CALIFORNIA STATE FIRE MARSHAL

Comments on the Proposed Cajon Pipeline
Page Five

(c) INSTRUMENTED INTERNAL INSPECTION DEVICES

California Government Code, Chapter 5.5 Section 51013(b) requires that any new pipeline on which the construction begins after January 1, 1990, shall be designed to accommodate the passage instrumented internal inspection devices, and shall have leak mitigation and emergency response plans and equipment as the State Fire Marshal may require. 20-19

(d) LEAK DETECTION

The leak detection or leak mitigation system for the new pipeline shall be approved by this Office before the pipeline is to be put into service. 20-20

RESPONSE TO LETTER 20:

20-19 Comment noted. No response required.

20-20 Comment noted. No response required.

COMMENT LETTER 21:
STATE LANDS COMMISSION

STATE OF CALIFORNIA

PETE WILSON, Governor

STATE LANDS COMMISSION

LEO T. McCARTHY, Lieutenant Governor
GRAY DAVIS, Controller
THOMAS W. HAYES, Director of Finance

EXECUTIVE OFFICE
1807 - 13th Street
Sacramento, CA 95814-7197

CHARLES WARREN
Executive Officer

December 21, 1992

Ms. Carol Whiteside
State Projects Coordinator
The Resources Agency
1416 Ninth Street, Room #449
Sacramento, CA 95814

Mr. Stephen Johnson
U. S. Bureau of Land Management
6221 Box Springs Blvd.
Riverside, CA 92507-0714

Dear Ms. Whiteside and Mr. Johnson:

Staff of the State Lands Commission (SLC) has reviewed the Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Cajon Pipeline Project, SCH #91082007. Based on this review, we offer the following comments.

From the information provided in the draft document, the proposed pipeline project will not cross State-owned land under the jurisdiction of the SLC. However, the original alignment proposed for the Cajon Pipeline, Routing Alternative #1 does cross State-owned land under SLC jurisdiction. If this alternative is chosen, authorization by the Commission is required and the SLC is a Responsible Agency under the California Environmental Quality Act (CEQA). 21-1

Thank you for the opportunity to comment. If you have any questions, please contact Don Reese at (916) 322-7808.

Sincerely,

for MARY GRIGGS
Environmental Review Section
Division of Environmental
Planning and Management

cc: Dwight E. Sanders
Don Reese
OPR

RESPONSE TO LETTER 21:

21-1 Comment noted. Table 1-2 has been revised to indicate that authorization across state-owned lands would be required from the State Lands Commission.

COMMENT LETTER 22:
BOARD OF SUPERVISORS, COUNTY OF SAN BERNARDINO

Board of Supervisors
County of San Bernardino

MARSHA TUROCI
SUPERVISOR, FIRST DISTRICT

December 21, 1992

Bureau of Land Management
Attn: Stephen L. Johnson
6221 Box Springs Boulevard
Riverside CA 92507-0714

Dear Mr. Johnson:

The following comments reflect concerns expressed to me by residents living in close proximity to the proposed Cajon pipeline:

1. INADEQUATE NOTICE — The scoping meeting was noticed only in the Adelanto paper. 22-1

2. INADEQUATE ANALYSIS OF PUBLIC SAFETY IMPACTS — The potential risk of heated oil under pressure escaping the pipeline, especially during a seismic event. 22-2

3. INADEQUATE DISCUSSION REGARDING THE OPERATION OF VALVES IN THE EVENT OF POWER FAILURE. 22-3

Additionally, the question was asked about the role of the California Energy Commission and/or the Public Utilities Commission in a project of this nature. It seems to me that one or the other agency should have been in an oversight capacity. 22-4

Sincerely,

Marsha Turoci

MARSHA TUROCI
County Supervisor
First District

San Bernardino County Government Center • 385 North Arrowhead Avenue • San Bernardino, CA 92415-0110 • (714) 387-4830

RESPONSE TO LETTER 22:

22-1 Refer to response to Comment 8-1.

22-2 The extent and potential of risk of upset of the pipeline is described in Section 5.12. The impacts regarding seismic events is analyzed in Section 5.2.

22-3 An Uninterruptible Power Supply (UPS) System at the pipeline Control Center and the pump stations will allow the continued operation of the SCADA system in the event of a loss of power. Should a power failure occur at a pump station, the electric pump motors will stop and the station inlet valve will close. The station UPS System will supply power to the station RTU for 15 minutes, which will alert the operator of the power failure and action would be taken to shut down the segment not affected by the power outage. A power failure at either 12 Gauge or Adelanto Station would shut down the entire system. The UPS System at the Control Center will supply power for a minimum of four hours. The UPS System would also allow closure of individual block valves in the event of a commercial power loss by activation of the solenoid valve on the pnemative valve actuators.

22-4 The Public Utilities Commission has reviewed the Draft EIS/EIR. Comments on this document by the PUC are made in Letter 32.

COMMENT LETTER 23: THE RESOURCES AGENCY

RESPONSE TO LETTER 23:

The Resources Agency

of California

Pete Wilson
Governor

Douglas P. Wheeler
Secretary

California Conservation Corps • Department of Boating & Waterways • Department of Conservation
Department of Fish & Game • Department of Forestry & Fire Protection • Department of Parks & Recreation • Department of Water Resources

December 22, 1992

Bureau of Land Management
ATTN: Stephen L. Johnson
6221 Box Springs Blvd.
Riverside, CA 92507

Dear Mr. Johnson:

The State has reviewed the Draft Environmental Impact Statement/Report for the Proposed Cajon Pipeline Project, San Bernardino and Los Angeles Counties, submitted through the Office of Planning and Research.

We coordinated review of this document with the State Lands Commission, the Air Resources Board, the Lahontan Regional Water Quality Control Board, and the Departments of Conservation, Fish and Game, Health Services, Parks and Recreation, Transportation, and Water Resources.

The State Lands Commission and the Departments of Conservation, Transportation, and Water Resources have submitted the attached comments for your consideration.

Thank you for providing an opportunity to review this project.

Sincerely,

William G. Shafroth
Assistant Secretary,
Land & Coastal Resources

Attachments

cc: Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814
(SCH 91082007)

The Resources Building Sacramento, CA 95814 (916) 653-5656 FAX (916) 653-8102

California Coastal Commission • California Tahoe Conservancy • Colorado River Board of California
Energy Resources Conservation & Development Commission • San Francisco Bay Conservation & Development Commission
State Coastal Conservancy • State Lands Commission • State Reclamation Board

Printed on recycled paper

COMMENT LETTER 23:
THE RESOURCES AGENCY

PETE WILSON, Governor

S COMMISSION

MERTHY, Lieutenant Governor
DAVIS, Controller
IAS W. HAYES, Director of Finance

EXECUTIVE OFFICE
1807 - 13th Street
Sacramento, CA 95814-7187

CHARLES WARREN
Executive Officer

December 21, 1992

2 Sacramento

Post-it® brand fax transmittal memo 7671	# of pages ▸ 3
To WHITESIDE/CAJON	From M. GRIGGS
Co. RESOURCES AGENCY	Co.
Dept.	Phone #
Fax # 653-0993	Fax #

Ms. Carol Whiteside
State Projects Coordinator
The Resources Agency
1416 Ninth Street, Room #449
Sacramento, CA 95814

Mr. Stephen Johnson
U. S. Bureau of Land Management
6221 Box Springs Blvd.
Riverside, CA 92507-0714

Dear Ms. Whiteside and Mr. Johnson:

Staff of the State Lands Commission (SLC) has reviewed the Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the Cajon Pipeline Project, SCH #91082007. Based on this review, we offer the following comments.

From the information provided in the draft document, the proposed pipeline project will not cross State-owned land under the jurisdiction of the SLC. However, the original alignment proposed for the Cajon Pipeline, Routing Alternative #1 does cross State-owned land under SLC jurisdiction. If this alternative is chosen, authorization by the Commission is required and the SLC is a Responsible Agency under the California Environmental Quality Act (CEQA). 23-1

Thank you for the opportunity to comment. If you have any questions, please contact Don Reese at (916) 322-7808.

Sincerely,

for MARY GRIGGS
Environmental Review Section
Division of Environmental
Planning and Management

cc: Dwight E. Sanders
Don Reese
OPR

RESPONSE TO LETTER 23:

State Lands Commission

23-1 Please refer to response to Letter 21.

COMMENT LETTER 23: THE RESOURCES AGENCY

State of California THE RESOURCES AGENCY OF CALIFORNIA

MEMORANDUM

To: Mr. Douglas P. Wheeler
Secretary for Resources

Date: November 30, 1992

Mr. Stephen Johnson
U.S. Bureau of Land Management
62221 Box Springs Blvd.
Riverside CA 92507-0714

From: Department of Conservation
Governmental and Environmental Relations

Subject: Joint Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Cajon Pipeline Project, SCH # 91082007

The Department of Conservation's Division of Oil and Gas has reviewed the joint EIR/EIS for the proposed Cajon Pipeline Project and submits the following comments for your consideration.

The proposed pipeline route(s) pass areas of the Montebello and Wilmington oil fields. In the Montebello area, the route comes within close proximity to numerous plugged and abandoned, active, and inactive oil wells.

If the pipeline or any structure associated with the project is located over or in the proximity of a plugged and abandoned well, there is the possibility that the well may need to be plugged and abandoned to current Division specifications. Section 3208.1 of the Public Resources Code (PRC) authorizes the State Oil and Gas Supervisor to order the reabandonment of any plugged and abandoned well when construction of any structure over or in the proximity of the well could result in a hazard. The cost of reabandonment operations is the responsibility of the owner of the property upon which the structure will be located. 23-2

Under Section 3208.1 of the PRC, the reabandonment responsibilities of the owner/developer of a property upon which a structure will be located need extend no further than the property boundaries. If a well requiring reabandonment, however, is on an adjacent property and near the common property line, the Division recommends that the structure be set back sufficiently to allow future access to the well.

Furthermore, if any plugged and abandoned or unrecorded wells are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If damage to a plugged and abandoned well occurs or an unrecorded well is uncovered, the Division's district office in Long Beach must be contacted to obtain information on the requirements for and approval to perform remedial operations.

RESPONSE TO LETTER 23:

Department of Conservation

23-2 Please refer to response to Letter 7.

COMMENT LETTER 23: THE RESOURCES AGENCY

Mr. Wheeler and Mr. Johnson
November 30, 1992
Page Two

Although the possibility for future problems from oil and gas wells that have been plugged and abandoned or reabandoned to the Division's current specifications are remote, we, nevertheless, suggest that a diligent effort be made to avoid building over any plugged and abandoned well. If construction over a plugged and abandoned well is unavoidable, we suggest that an adequate gas venting system be placed over the well.

Any idle wells within the project area should be plugged and abandoned unless adequate provisions are taken to ensure that operators have access to these wells.

To ensure proper review of building projects within the subject area, the Division has available an informational packet entitled, "Construction Project Site Review and Well Abandonment Procedure". The packet outlines the information that a project developer must submit to the Division for review. Developers should contact the local building department for a copy of the site review packet.

Prior to commencing operations, the project applicant should consult with the Division district office in Long Beach for information on the wells located in the project area.

23-2

The Division is mandated by Section 3106 of the PRC to supervise the drilling, operation, maintenance, and abandonment of wells for the purpose of preventing: (1) damage to life, health, property, and natural resources; (2) damage to underground and surface waters suitable for irrigation or domestic use; (3) loss of oil, gas, or reservoir energy; and (4) damage to oil and gas deposits by infiltrating water and other causes. Furthermore, the PRC vests in the State Oil and Gas Supervisor the authority to regulate the manner of drilling, operation, maintenance, and abandonment of oil and gas wells so as to conserve, protect, and prevent waste of these resources, while at the same time encouraging operators to apply viable programs for the purpose of increasing the ultimate recovery of oil and gas.

The scope and content of information that is germane to the Division's responsibility are contained in Section 3000 et seq. of the Public Resources Code, and administrative regulations under Title 14, Chapter 4 of the California Code of Regulations.

If you have any questions, please feel free to contact Richard Corbaley at the Division district office in Long Beach. The address is 245 West Broadway, Suite 475, Long Beach, CA 90802; phone (310) 590-5311.

Deborah L. Herrmann
Deborah Herrmann
Environmental Program Coordinator

cc: Richard Corbaley, Division of Oil and Gas, Long Beach
Michael Stettner, Division of Oil and Gas, Sacramento

RESPONSE TO LETTER 23:

COMMENT LETTER 23: THE RESOURCES AGENCY

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY PETE WILSON, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 8, P.O. BOX 231
SAN BERNARDINO, CA 92402
TDD (714) 383-4609

December 10, 1992

08-SBd-Var-Var
SCH #91082007

Ms. Nadell Gayou
Department of Water Resources
1416 Ninth Street
Room 449
Sacramento, CA 95814

Dear Ms. Gayou:

Draft Environmental Impact Report
for Cajon Pipeline

We have reviewed the above-referenced document and request consideration of the following comments:

* It is advisable that the casing shown to protect the pipeline under State routes be provided for the planned width of the ultimate State facilities. The ultimate right of way width of the State routes impacted within Caltrans District 8 region are as follows: 23-3

State Route	Ultimate Width
395	300
18	180
15	300
10	300

* This project will require an Encroachment Permit for work within the State highway right of way; the Department of Transportation would be a responsible agency and may require certain measures be provided as a condition of permit issuance. All matters relating 23-4

RESPONSE TO LETTER 23:

Department of Transportation

23-3 Comment noted. Standard pipeline practice is to case road crossings the entire ROW width (or future projected width). The widths shown do not present a problem.

23-4 Comment noted.

COMMENT LETTER 23:
THE RESOURCES AGENCY

Ms. Nadell Gayou
December 10, 1992
Page 2

to the Encroachment Permit process, which include access, grading, and drainage issues, should be sent to:

Ms. Cynthia Hudson
Permits
California Department of Transportation
P.O. Box 231
San Bernardino, CA 92402

23-4

Early and continuous consultation with Caltrans for specific locations involving State routes is recommended. If you have any questions, please contact Al Muller at (714) 383-4550 or FAX (714) 383-5936.

Sincerely,

for

HARVEY J. SAWYER, Chief
Transportation Planning
San Bernardino Coordination
Branch

RESPONSE TO LETTER 23:

COMMENT LETTER 23: THE RESOURCES AGENCY

State of California — The Resources Agency

Memorandum

Date: December 8, 1992

To:
1. Project Coordinator
   Resources Agency
2. U.S. Department of the Interior
   Bureau of Land Management
   6221 Box Springs Boulevard
   Riverside, California 92507-0714
   Attention: Stephen Johnson

From: Department of Water Resources

Subject: SCH 91082007-Draft Environmental Impact Statement, Cajon Pipeline, San Bernardino and Los Angeles Counties

The Department of Water Resources, Division of Operations and Maintenance, would like to thank you for the opportunity to review and comment on the above referenced DEIS/DEIR.

The Cajon Pipeline Company proposes to build a 141-mile-long, 20-inch-diameter insulated buried pipeline from 12-Gauge Lake to the Los Angeles crude oil terminals in Carson and Long Beach, California. Crude oil from the Santa Barbara Channel and the San Joaquin Valley would be delivered to 12-Gauge Lake by the existing All-American Pipeline. From there it would be conveyed to the Los Angeles Basin via the proposed Cajon Pipeline. The Cajon Pipeline would have a maximum capacity of 180,000 BPD but would be expected to operate at an average flow of 110,000 BPD. Two pump stations would be needed to move tested crude oil through the pipeline. One pump station, together with storage, would be located at 12-Gauge Lake. The other pump station, together with control and maintenance facilities, would be located in the City of Adelanto.

The DEIS/DEIR for the proposed Cajon Pipeline Project includes an analysis of the environmental impacts of the proposed pipeline system during construction and operation. The document focuses on impacts to land uses; traffic congestion and access restrictions; noise level increases and air quality concerns; risk of oil spills and associated impacts and geologic hazards; onshore water resources; cultural resources; socioeconomic impacts; visual resources; and alternatives.

For most of the route, the Cajon Pipeline would be situated within or adjacent to existing public or private rights-of-way. The pipeline would cross 23 streams or canals, the largest being the California Aqueduct, Cajon Wash, and the Los Angeles River. The pipeline crosses the California Aqueduct at Aqueduct Milepost 390.39. This crossing is at the intersection of the California Aqueduct and Baldy Mesa Road in San Bernardino County.

RESPONSE TO LETTER 23:

COMMENT LETTER 23: THE RESOURCES AGENCY

Project Coordinator, et al
December 8, 1992
Page Two

The DEIS/EIR also discusses two alternative plans and the no project alternative. Neither of the alternative plans poses any additional impacts, or reduced impacts, on the California Aqueduct over and above the chosen alignment.

Following are DWR's review comments on SCH 91082007:

1. Listed in Chapter 1, page 7 of the report, under Table 1-2, are the approval requirements for the Cajon Pipeline. Table 1-2 details the Federal, State, and Local Public Agencies which applications and/or permits will be required from prior to construction. Under the heading "California Governmental Agencies," DWR is not listed as the owner/operator of the California Aqueduct. On page 1-8 of the report, Los Angeles Department of Water and Power is incorrectly listed as the owner/operator of the Aqueduct. The lead agency will need to contact DWR'S Division of Land and Right of Way, requesting an encroachment permit package. The package will provide the applicant with DWR's encroachment permit guidelines which will detail the requirements and conditions that a applicant must adhere to prior to DWR's approval of the proposed crossing. DWR's review and approval of detailed engineering plans and specifications for the pipeline project will be required prior to permit issuance. 23-5

2. On page 1-8, Table 1-1, Valve Locations, the document indicates that a block valve will be located on the north side of the California Aqueduct at Project Milepost 51.7, with a check valve located on the south side of the California Aqueduct at Project Milepost 51.9. The block valve will be remote controlled while the check valve will be automatic. The 2/10 of a mile separation between the two valves equates to 1,056 feet. The Aqueduct right-of-way is 400 feet wide at the point of intersection of the proposed pipeline. This indicates that the valve locations are 300- feet outside of our right-of-way. We request that the block valve and the check valve locations be placed as near to our right-of-way fence as possible. 23-6

3. The pipeline must be designed so that any leakage will not reach the Aqueduct. Our requirements for pipeline crossings of the Aqueduct are as follows: 23-7

RESPONSE TO LETTER 23:

Department of Water Resources

23-5 Table 1-2 has been revised to indicate that an encroachment permit is required from the Department of Water Resources. The owner/operator of the California Aqueduct has been corrected on page 1-8.

23-6 Comment noted. The valves shall be located closer to the right-of-way boundary of the California Aqueduct per the Department's request.

23-7 Comment noted. These additional requirements have been incorporated into revised Mitigation Measure 5.12.1-1(b) (iii)

5.12.1-1(b) iii. *The pipeline will be concrete coated at crossings of Cajon Wash (M.P. 72), Los Angeles River (M.P. 135.7), and San Jose Creek (M.P. 110.1 - 117.2), to help reduce the risk of oil spill effects on significant water supplies and biologically sensitive areas.*

The pipeline bored under the California Aqueduct shall be installed inside a casing pipe within DWR's right-of-way. The casing pipe and the pipeline shall be cathodically protected and dielectrically isolated from each other. In addition, the pipeline shall be dielectrically coated and sealed to the casing by the use of a link seal or equivalent. A 2-inch I.D. drain line shall be provided for at the low end of the casing pipe, sloped towards daylight, and away from the Aqueduc t. A 3-inch standard weight galvanized steelguard post shall be installed adjacent to each drain line. The post shall extend three feet above the ground and 18-inches below ground. The bottom of the post shall be embedded in at least one cubic foot of concrete.

The pipeline shall be either concrete coated or installed inside casing pipe adjacent to the Etiwanda Creek percolation basins. The design of the pipeline at this location shall be finalized following consultation with the San Bernardino County Flood Control District.

23-8 Comment noted. Details of construction scheduling, and other measures required for construction at individual locations will be reviewed with local jurisdictions after the alignment has been finalized and construction plans have been prepared.

COMMENT LETTER 23: THE RESOURCES AGENCY

a. The crude oil pipeline to be bored under the California Aqueduct must be installed inside a casing pipe within DWR's right-of-way. The casing pipe and the crude oil pipe must be cathodically protected and dielectrically isolated from each other. In addition, the crude oil pipeline must be dielectrically coated and sealed to the casing by the use of a link seal or equivalent.

b. A 2-inch I.D. drain line shall be provided for at the low end of the casing pipe, sloped towards daylight, and away from the Aqueduct. A 3-inch standard weight galvanized steelguard post shall be installed adjacent to each drain line. The post shall extend 3 feet above the ground and 18-inches below ground. The bottom of the post is to be embedded in at least 1 cubic foot of concrete.

Additional DWR requirements for this pipeline crossing may be imposed. The additional requirements, if any, will be determined after receipt and review of detailed engineering plans and specifications for the Cajon Pipeline. The encroachment permit guidelines mentioned on page two, item 2, of this review letter will clarify the requirements for encroachment permit issuance to the applicant. 23-8

In closing, our Southern Field Division has not had the opportunity to review this document. Our Headquarters review staff has made several unsuccessful attempts to contact Stephen Johnson, contact person for the U.S. Department of Interior, Bureau of Land Management, in Riverside California, for an additional copy of the document to be delivered to our Southern Field Division. Our staff also contacted the City of Adelanto for the additional copy at which time they informed us to contact Stephen Johnson. Therefore, additional comments may be forthcoming from DWR regarding this proposed project. 23-9

If you have any questions regarding our review of SCH 91082007, please contact David Wrightsman at (916) 653-7168.

Keith A. Barrett

Keith Barrett, Chief
Division of Operations
and Maintenance

RESPONSE TO LETTER 23:

23-9 Comment noted.

COMMENT LETTER 24:
MOJAVE WATER AGENCY

RECEIVED

Mojave Water Agency

December 22, 1992

Mr. Stephen Johnson
Bureau of Land Management
6221 Box Springs Blvd.
Riverside, CA 92507-0714

RE: Cajon Pipeline Draft Environmental Impact Report

Dear Mr. Johnson:

Thank you for the opportunity to comment on the referenced project. The Mojave Water Agency (MWA) is mainly concerned with the impacts the Cajon Pipeline may have on water quality and supply. The Cajon Pipeline will be crossing a large portion of the Mojave River watershed, and the Mojave River groundwater supplies provide the only source of water to the High Desert region.

The EIR does not identify the source from which water will be obtained to perform periodic hydrostatic testing, dust control, soil compaction. The Agency wishes to inform the parties involved with this project that the entire watershed of the Mojave River is undergoing an adjudication of water rights. Adjudication is the legal process in which the court determines the amount of water each water user may use without incurring a replenishment obligation. The adjudication could result in a reduction of historic pumpage by water users within the Mojave River watershed. As stated in the EIR, the project will require the use of approximately 26 acre feet of water to perform hydrostatic testing. The adjudication process may limit sources of water available for purchase within the Mojave River Basin. The Agency recommends that the source of water be identified as soon as possible to clarify what entity will meet the new water demand created by this project. 24-1

22450 Headquarters • P.O. Box 1069 • Apple Valley, CA 92307 • (619) 240-9201 • FAX (619) 240-2642

George R. Parker, Division # 1
Elayne Jay Gabaee, Division # 2
Bill A. Christopher, Division # 3
Anita M. Haba, Division # 4
Thomas H. Irwin, Division # 5
Beverly J. Lowry, Division # 6
John H. Russell, Division # 7
Larry W. Brown, P.E., General Manager/Chief Engineer

RESPONSE TO LETTER 24:

24-1 Comment noted. The source of the water has yet to be determined.

COMMENT LETTER 24: MOJAVE WATER AGENCY

Mojave Water Agency

Mr. Johnson
December 22, 1992
Page 2

The Cajon Pipeline project has the potential to impact water quality within the Mojave River watershed. The EIR has addressed possible impacts to groundwater and surface waters. Soil contamination and eventually groundwater contamination could occur if the pipeline were to leak or rupture. Project development will increase sediment yield and erosion which could impact water quality at stream crossings and the ability of the stream to transport and absorb water. The MWA also has concerns about contaminated surface runoff at the Adelanto storage and pump station. The MWA believes these impacts can be mitigated through the development of an adequate oil spill contingency plan, erosion and sedimentation control plan, and a drainage plan. The MWA would like to review these plans when developed. 24-2

Again, thank you for the opportunity to comment. If you have any questions please call me at 240-9201.

Sincerely,

Norman T. Caouette
Director of Planning
and Resource Development

cc: Planning and Resource Development Committee

vlw

RESPONSE TO LETTER 24:

24-2 Comment noted. The Oil Spill Contingency Plan must be approved by the U.S. Environmental Protection Agency and must conform to the requirements of the Pipeline Safety Act. Conformance with these requirements will provide adequate procedures and assurances for spill clean-up; therefore, no additional mitigation is required.

COMMENT LETTER 25: CITY OF SOUTHGATE

City of South Gate

8650 CALIFORNIA AVENUE • SOUTH GATE, CA 90280-3075 • (213) 563-9500
FAX (213) 567-6755

DEPARTMENT OF COMMUNITY DEVELOPMENT
ANDREW G. PASHAKIAN
DIRECTOR

Bureau of Land Management
6221 Box Springs Road
Riverside, CA 92507-0714

December 23, 1992

Attn: Stephen L. Johnson

Subject: CAJON PIPELINE PROJECT - EIR/EIS - SCH #91082007

Dear Mr. Johnson:

The City of South Gate has completed it's review of the Draft Environmental Impact Report/Statement (EIR/EIS) for the proposed 'Cajon Pipeline' project. Based on that review the City has prepared the following comments, which are summarized below and are predicated on the requirements of both the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). These comments are focused on the EIR/EIS's omission of the appropriate level of consideration to the project's environmental implications at the local level. This is particularly evident when reviewing the probable impacts during construction and ongoing operations, especially in the case of a major seismic event.

Summary of Concerns

- Lack of technical data and analysis of the EIR/EIS to provide the reviewing body and decision makers with a sufficient level of detail to make informed decisions of a projects consequences. (CEQA Section 21061 and NEPA Section 1500.1) 25-1
- Lack of recognition as to the local agencies review and permitting processes for excavation, construction and franchise agreement requirements. The City feels the project proponents are either unaware of the time requirements involved to complete these processes within the various jurisdictions, or are overly optimistic about project implementation as demonstrated by the estimated start of project construction date of mid-first quarter 1993. 25-2
- Lack of recognition of the process and problems of coordination with local agencies before and during construction. 25-3
- Most of the environmental discussion is focused on the rural segments of the pipeline and only cursory discussion is given to the effects on the urban segments, hence the focus of the City's comments. 25-4

RESPONSE TO LETTER 25:

25-1 In preparing the Draft EIS/EIR, it was certainly the intent to satisfy the requirements of CEQA and NEPA and provide sufficient detail to adequately disclose potential impacts and foster informed decision-making. The commentor would need to present specific concerns about possible inadequacies in the information and analysis provided in the document in order to formulate a response and remedy the problem.

25-2 The Cajon Pipeline Company has personnel experienced in constructing similar pipelines and is aware of the required permits and agreements which must be obtained from local, as well as state and federal, agencies. It is certainly possible that it will take longer to obtain the required approvals and permits than the proponent has estimated. Table 1-2 of the Draft EIS/EIR summarizes the permits, agreements, and approvals which will be needed to commence construction of the project.

25-3 See response to Comment 25-2.

25-4 The Draft EIS/EIR attempted to address all impacts adequately, whether they were to occur in urban or rural areas. The analysis in the Draft EIS/EIR indicates that the majority of significant impacts are most likely to occur in the less urbanized areas along the route of the pipeline. This is due primarily to the biological and cultural resources which would be affected along the Mojave Desert portion of the pipeline route. A variety of impacts would also occur along the urbanized portions of the route. However, these are primarily less significant construction-related impacts, such as traffic disruption and noise.

25-5 The precise alignment of the proposed pipeline has not yet been determined. As with other construction and development projects, final engineering and construction plans are typically not prepared until after the environmental evaluation has been completed. Specific construction proposals for the pipeline segments which will cross or run adjacent to river channels are currently under investigation. These details will be presented to appropriate agencies for review at the time local approvals are sought.

COMMENT LETTER 25: CITY OF SOUTHGATE

With regard to the above statements, the City would like to suggest that the revisions to the Draft EIR/EIS include but not necessarily be limited to the following suggestions:

1. The incorporation of a reasonable level of technical detail, including construction proposals along the Rio Hondo Channel and Los Angeles River, at the local level to enable reviewing bodies and decision making authorities a solid foundation for making judgements and decisions regarding the proposed project. 25-5

2. The use of graphics to represent data and conclusions as provided by Section 15147 of CEQA and Section 1502.8 of NEPA. For example, a map should be prepared showing the pipeline route alignments, in greater detail, in relation to levees and/or adjacent landuses. 25-6

3. The relationship between this proposed project and the Army Corps of Engineers' levee improvement plan along the Los Angeles and Rio Hondo channels should be addressed, particularly the impact of the pipeline construction on the stability of the levees. 25-7

4. More detail needs to be provided on the impacts of a spill or pipe failure on the river channels particularly during a period of high water when the potential for environmental effects is greatly enhanced. Are there any archeological or historical sites which are at risk? 25-8

5. Discuss the impacts of liquefaction on the structural integrity of the pipeline during a major seismic event. 25-9

6. More detail needs to be provided on the impacts of a spill or leakage on the underground water resources along the route of the pipeline. 25-10

7. Discuss the provisions for local road widening in relation to the streets crossing the Rio Hondo Channel and Los Angeles River. 25-11

8. What measures will be implemented to protect local underground metallic structures from the side effects of the cathodic protection of the pipeline. 25-12

RESPONSE TO LETTER 25:

25-6 As indicated above, greater detail on pipeline alignments will be developed as the project, if approved, moves into the next engineering stages. Maps showing alignment and land use details along the proposed 142-mile route of the pipeline would make the EIS/EIR document overly cumbersome if included. It was the determination of the lead agencies and the EIS/EIR preparers that such detailed mapping was not needed nor appropriate for the environmental analysis. Appendix A of the Draft EIS/EIR presents mapping of key segments of the pipeline route on U.S.G.S. 7.5 minute quadrangle base maps.

25-7 As indicated in response to Comment 25-5, details on the construction of the pipeline in relation to the river channels is not available beyond the description provided in the Draft EIS/EIR. Coordination with the Army Corps of Engineers will need to occur to ensure compatibility with construction plans for levee improvements to the Los Angeles and Rio Hondo channels.

25-8 Impacts of an oil spill to water resources are addressed in Section 5.3 of the Draft EIS/EIR. The cultural survey undertaken did not identify any significant cultural resources in or near the river channels which the pipeline route crosses.

25-9 As with other structures located in areas of liquefaction potential, the pipeline would be subject to a loss of structural support and possible movement during a significant seismic event. The pipeline will be designed with suitable structural reinforcement to minimize the possibility of rupture. Soil characteristics will be modified in areas of liquefaction potential to minimize movement and prevent loss of structural integrity.

25-10 In the event an oil spill from the pipeline, heated oil would spread over the surrounding soil until it cooled and became too viscous to flow readily. Once the crude oil has cooled after a spill, it will not penetrate the ground surface to any great depth due to its heavy, viscous nature. The saturated soil would then need to be removed to prevent the oil from eventually being transmitted down into the groundwater. The pipelines's oil spill detection system would provide indication of a spill within seconds or hours, depending on the size of the leak, and is described on page 3-14 of the Draft EIS/EIR.

COMMENT LETTER 25: CITY OF SOUTHGATE

Based on the level of data provided to the City at this time, the City takes issue with the acceptability of the EIR/EIS document pursuant to the intent and the requirements of adequacy as set forth in both CEQA and NEPA, Sections 21061 and 1500.1, respectively. 25-13

The lack of a State Clearing House file number on the document makes easy reference to it difficult. This oumber should be a part of the title page in the future. 25-14

The City would like to request a copy of the Final EIR/EIS upon completion. Additionally the City reserves to right to review project related plans for any area within the City's jurisdictional boundaries. Also the City may require a separate environmental assessment should the City decide, during the permitting process, the EIR/EIS does not adequately address specific impacts or issues relevant to the local area. 25-15

Should you have any questions regarding these comments, please contact Associate Planner Elizabeth V. Lefson at (213) 563-9528 ext 248.

Sincerely,

ANDREW G. PASMANT
Director of Community Development

RESPONSE TO LETTER 25:

25-11 The pipeline route along the Rio Hondo channel and the Los Angeles River will not be affected by any road widenings which may occur on cross streets, The street crossings of the Rio Hondo channel and the Los Angeles River are all bridge crossings. The pipeline will be constructed along the channel below each bridge. Coordination with the U.S. Army Corps of Engineers and the Los Angeles County Department of Public Works will be required for construction within the flood control channel right-of-way.

25-12 The cathodic protection system poses no threat or hazard to nearby underground structures, therefore, no special protection measures are needed. The system produces only a small amount of electric current which will be confined to the pipeline.

25-13 Comment noted. Please see response to Comment 25-1.

25-14 Comment noted. The State Clearinghouse number has been included on the introductory pages of the Final EIS/EIR.

25-15 Comment noted. Appropriateness of subsequent environmental review by local responsible agencies is discussed in Section 15052 of the CEQA Guidelines. The city of Southgate would need to assume lead agency responsibility in order to conduct subsequent environmental review of the proposed project.

COMMENT LETTER 26:
CITY OF LOS ANGELES, DEPARTMENT OF WATER AND POWER

Department of Water and Power — the City of Los Angeles

December 23, 1992

Bureau of Land Management
U.S. Department of the Interior
6221 Box Springs Boulevard
Riverside, California 92507-0714

Attention Mr. Stephen L. Johnson

Gentlemen:

Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Cajon Pipeline

The Los Angeles Department of Water and Power (Department) - Water System has received the EIS/EIR for the proposed Cajon Pipeline project. Based on the information received, we have the following general comments:

1. Table 1-2, outlining the Approval Requirements for the Cajon Proposal, on pages 1-8, identifies the Department as the approving agency for any crossing of the California Aqueduct. This statement is in error. The California Aqueduct is under the authority of the State of California Department of Water Resources (DWR), not the Department as stated. Only DWR can approve a crossing of the California Aqueduct. 26-1

2. The preferred project alternative will not affect the First Los Angeles Aqueduct (FLAA), the Second Los Angeles Aqueduct (SLAA), or their related facilities. 26-2

3. Construction of the M-70 Pipeline alternative or the Pacific Pipeline Alternative may impact the FLAA and SLAA by disrupting water deliveries to Los Angeles in the event of a major leak of the M-70 Pipeline. A pipeline leak, rupture, or spill may contaminate the water within the Los Angeles Aqueduct high-speed channel. The area of potential impact is at the intersection of the following freeways: U.S. Interstate 5 (Golden State Freeway), U.S. Interstate 210 (Foothill Freeway), and California State Highway 14 (Antelope Valley Freeway). 26-3

Water and Power Conservation . . . a way of life

111 North Hope Street, Los Angeles, California ☐ *Mailing address:* Box 111, Los Angeles 90051-0100
Telephone: (213) 481-4211 *Cable address:* DWPWOFLA *FAX:* (213) 481-4701

RESPONSE TO LETTER 26:

26-1 Comment noted. Table 1-2 has been revised to show the Department of Water Resources as owner/operator of the California Aqueduct.

26-2 Comment noted. No response required.

26-3 Comment noted. No response required.

COMMENT LETTER 26:
CITY OF LOS ANGELES, DEPARTMENT OF WATER AND POWER

The following comments are specifically related to the M-70 Pipeline and Pacific Pipeline Alternatives:

1. The FLAA and SLAA deliver approximately 75 percent of the water supply to the City of Los Angeles with a replacement water cost, if available, of over $310,000 per day. The replacement cost estimate does not include those costs associated with increased water treatment, replacement and repair of the Aqueducts, and cleanup of spill areas.

2. Aqueduct structures and related facilities that are vulnerable to contamination or damage include the following: pressurized pipe sections, open channels, the Aqueduct Cascades, and the Los Angeles Aqueduct Filtration Plant.

3. Due to the potential impacts associated with either alternative, approval of any plans to cross the FLAA and SLAA easements or Department fee properties are subject to review and conditions set forth by the Department.

4. All future correspondence concerning Department right-of-ways, easements, or fee property should be directed to the following:

   Los Angeles Department of Water and Power
   Atention Mr. Lawrence L. Green
   Real Estate Division Manager
   Real Estate Division
   P.O. Box 111, Room 1203
   Los Angeles, California 90051

26-4

Thank you for the opportunity to comment on the EIS/EIR. If you have any questions, please contact Mr. Miguel Bielich of my staff at (213) 580-3972.

Sincerely,

James F. Wickser

JAMES F. WICKSER
Assistant General Manager - Water

c: Mr. Lawrence L. Green
Mr. Miguel Bielich

RESPONSE TO LETTER 26:

26-4 Comment noted. No response required.

COMMENT LETTER 27: METROPOLITAN WATER DISTRICT

MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

DEC 23 1991

Office of the General Manager

Mr. Stephen L. Johnson
Bureau of Land Management
6221 Box Springs Boulevard
Riverside, California 92507-0714

Dear Mr. Johnson:

Draft Environmental Impact Report/Enviromental Impact Statement for the Cajon Pipeline Project

We have received the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Cajon Pipeline Project. The project proposes to build a 142-mile long, 20-inch-diameter oil pipeline from 12-Gauge Lake, 27 miles west of Barstow, California, to the Los Angeles crude oil terminals in Carson and Long Beach. The comments herein represent Metropolitan's response as a potentially affected public agency.

Our review of the Draft EIR/EIS indicates that Metropolitan has seven facilities in the vicinity of your proposed project. These facilities include:

- The Foothill Feeder Rialto Pipeline, where it crosses the Devore Freeway in Rancho Cucamonga;
- The Upper Feeder, where it crosses the Devore Freeway in Cucamonga;
- The Yorba Linda Feeder, where it crosses the Southern Pacific Transportation Company railroad and the Union Pacific Railroad; 27-1
- The Orange County Feeder, where it crosses and parallels for a short stretch, Valley Boulevard, San Jose Creek, and the Southern Pacific Transportation Company railroad;
- The Second Lower Feeder, where it crosses the Long Beach Freeway in Long Beach; and
- The Long Beach Lateral and Extension and Discharge Valve & Relief Structure, where it crosses the Long Beach Freeway in Long Beach.

1111 Sunset Boulevard, Los Angeles, California • Mailing address: Box 54153, Los Angeles, California 90054 • Telephone (213) 250-6000

RESPONSE TO LETTER 27:

27-1 Comment noted. The locations of all existing and planned infrastructure locations, including water supply pipeline improvements will be researched and taken into proper account in preparing plans for the construction of the proposed pipeline. Details of construction at individual locations will be reviewed with local jurisdictions and agencies after the alignment has been finalized and construction plans have been prepared.

COMMENT LETTER 27:
METROPOLITAN WATER DISTRICT

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Mr. Stephen L. Johnson -2-

The attached maps show Metropolitan's facilities in relation to your proposed project. It will be necessary to consider these facilities in your project planning.

In order to avoid potential conflicts with Metropolitan's facilities, we request that preliminary prints of all improvement plans for any activity in the area of Metropolitan's pipelines and rights-of-way be submitted for our review and written approval. You may obtain detailed prints of drawings of Metropolitan's pipelines and rights-of-way by calling Metropolitan's Substructures Information Line at (213) 250-6564. A statement of guidelines for development in Metropolitan's facilities area, fee properties or easements has been attached for your information. 27-2

Metropolitan, in particular, requires that its cathodic protection stations be located prior to the proposed work, as specified on page 8, Item 7 m. of our guidelines. 27-3

In the event of a failure of the Cajon Pipeline near or under a Metropolitan pipeline, immediate notification should be made to Metropolitan's Eagle Rock facility at (213) 681-4010. 27-4

Additionally, Metropolitan also requires that in the event of any failure of the Cajon pipeline near or under the California Aqueduct, immediate notification should be made to both Department of Water Resources' Operations Center at (916) 653-7766 and Metropolitan's Eagle Rock facility. 27-5

We appreciate the opportunity to provide input to your planning process. If we can be of further assistance, please contact me at (213) 250-6272.

Very truly yours,

Kathleen M. Kunysz

Kathleen M. Kunysz
Manager, Environmental Affairs

JA/gg

Attachments

cc: Department of Water Resources
Operations Center
Resources Building, Rm. 1618-23
Sacramento, California 95814

RESPONSE TO LETTER 27:

27-2 See response to Comment 27-1.

27-3 See response to Comment 27-1.

27-4 Comment noted. This information shall be included in the COM Plan.

27-5 Comment noted. This information shall be included in the COM Plan.

COMMENT LETTER 28:
WHITE ROAD PROPERTY OWNER'S ASSOCIATION

WRPOA White Road Property Owners Association
8812 White Road • Phelan, California 92371 (619) 949-7132

December 28, 1992

Bureau of Land Management
Attn: Stephen L. Johnson
Project Manager
6221 Box Springs Boulevard
Riverside, CA 92507-0514

Dear Mr. Johnson,

Thank you for the opportunity to comment further on the EIS/EIR for the proposed Cajon Pipeline from Barstow thru the Los Angeles Basin to terminals in Carson and Long Beach. These written comments are in addition to my oral testimony presented at the Scoping Hearing held December 3, 1992 in Adelanto. Since I am a resident of the High Desert most of my concerns about this project involve the area between Barstow and the Lytle Creek fault area (MP 0 to MP 74.5), yet some comments are general to the entire project.

First I would like to address specific portions of the EIS/EIR that I find to be incomplete or inaccurate in content.

. What provisions are being made to protect the pipeline storage facilities at the Cajon Terminal and/or the control station at Adelanto in the event of the rupture of a previously unknown earthquake fault such as occurred in Landers in June of 1992? 28-1

. Will the spill-control earthen dikes and drains at the Cajon Terminal be effective if a surface rupture should occur at that site causing the storage tanks to be destroyed and the dikes breached? 28-2

. What magnitude of spill will the asphalt curbing thru the Cajon Pass and along Lytle Creek control? If this curbing was destroyed during a severe earthquake in the vicinity, and there was a rupture of the pipeline, is there any other means to protect the sensitive environment of this area? 28-3

. How can the entire pipeline be engineered to mitigate damage in the event of an unknown fault rupture and surface displacement of the magnitude that occurred in Landers in June of 1992? 28-4

. In the event of a power failure to the control center is there a means of monitoring the pipeline other than SCADA? 28-5

RESPONSE TO LETTER 28:

28-1 The storage facilities at the Cajon Terminal will be constructed in compliance with the seismic safety standards specified in the Uniform Building Code. Construction according to these standards should enable the structures to withstand the anticipated effects of ground shaking during an earthquake. In the circumstance that the storage facilities are located directly above a yet undiscovered fault, the ground surface would be subject to possible rupture and displacement which could cause more substantial damage to the facilities, possibly resulting in an oil spill. A subsequent fire is also a possibility. The only way to completely avoid such a scenario is to not locate the facilities atop an active fault. The proposed storage facilities are not located in close proximity to any known active fault lines.

28-2 If the dikes are ruptured as a result of a major seismic event, any spilled oil could possibly flow beyond the containment area. The spilled oil would saturate the ground over which it flows. The crude oil is very thick and must be heated to flow readily. The spilled oil would soon cool and become too viscous to flow and therefore would not travel a great distance across the ground surface.

28-3 The curbing would control the amount of oil contained in the pipeline between valves. In the event of spill, valves would automatically close in order to minimize the amount of oil spilled. Therefore, the amount of oil remaining in the ruptured segment of the pipeline after the valves have been closed is the maximum projected spill size. If the curbing were destroyed, oil could flow beyond the curbing and affect a larger area. As described in the response to comment 28-2, the oil would not flow a great distance due to its heavy, viscous nature. Except for clean-up methodology, there are no other measures proposed to be included in the Oil Spill Contingency Plan (OSCP) for containing the flow of spilled oil on the ground.

COMMENT LETTER 28:
WHITE ROAD PROPERTY OWNER'S ASSOCIATION

Cajon Pipeline Draft EIS/EIR
December 28, 1992
Page Two

. How long would it take to pin-point a leak in the pipeline and make needed repairs? 28-6

. How severe would a leak or spill need to be before the entire pipeline is shut down?

. Is there a way to close the remote operated block valves in the event the "sender" power line from the Adelanto control station is inoperable due to either a power failure or the line is actually severed? 28-7

. Are there any other metering stations other than Cajon Terminal (M.P. 0), Adelanto Station (M.P. 45), and the GATX and Hynes terminals (M.P. 138 and 142)? 28-8

. A major oil spill and the damage from such to the environment are a major concern. Response to a spill and containment thereof, being a part of the operation of the pipeline, should be included in this study/report as the areas being considered for this project offer unique challenges to design, response and containment. 28-9

. Your identification of Archaeological Resources in Section 5.11 is by site number only. Attached is a "Study Map" of the area between Adelanto and the Cajon Pass. Have the "darkened" areas on this map located within the project area, also been evaluated? 28-10

. Table 3-1, *"Valve Locations Along Cajon Pipeline Route"*, and Figure 3-2, *"Longitudinal Profile"* are inconsistent. Table 3-1 indicates "R" = remotely operated from Adelanto and "A" = automatically operated (check valves). Figure 3-2 indicates "R" = automatic check valves and "A" = remote operated block valves. 28-11

. Figure 3-2, *"Longitudinal Profile"*, shows that from just before M.P. 60 (summit of Baldy Mesa) to just beyond M.P. 125 there is no automatic check valve. This is one-half the entire pipeline capacity that is vulnerable if there were a power failure to the system. 28-12

. The tables comparing active and potentially active faults for the Cajon Pipeline and the alternative routes (4.1.1-1, 4.1.4-1, 4.1.5-1 and 4.1.6-1), although interesting, do not provide comparable data and thus valid comparisons cannot be made between the four possible routes. (Table 4.1.5-1 does not specify the route for which the information pertains, however, by process of elimination, I think it is the Pacific Pipeline.) 28-13

RESPONSE TO LETTER 28:

28-4 The pipeline design will include special construction at all known active fault crossings to mitigate lateral displacements associated with fault rupture. Proposed design details dealing with fault crossings are described in mitigation measure 5.1.1-1 in the Draft EIS/EIR. If an unknown fault is discovered in the future along the route of the pipeline, these construction techniques will probably not be in place along the affected section of the pipeline unless it bisects the pipeline in an area where design for a known active fault occurs. If this situation occurs, the hazard potential will need to be re-evaluated to determine if any retro-fitting of the pipeline is warranted. However, it is not practical or within present state-of-the-art engineering practices to be able to treat the whole pipeline as if it was within an active fault from one end to the other.

28-5 In the event of a power failure, an uninterruptable standby power supply installed concurrently with the SCADA system will provide sufficient power for the system to shut down. Refer to response to Comment 22-3.

28-6 The pipeline's leak detection system would detect small leaks (3-5 barrels per hour) within a twelve-hour time frame. A major rupture would be detected within 15 seconds. When a leak is detected, valves would be closed and the pipeline would be shut down. The pipeline would be shut down even in the event of a small leak. The general area of the leak would be known, but it could take a little time to discover the precise location of the leak if it is small. The length of time needed to repair the pipeline would depend on the nature and extent of the damage.

28-7 The system will be set up with standby power supply. In addition, the valves proposed to be installed will be designed to close automatically if there is a loss of power. Please see the response to comment 22-3 for additional information.

28-8 Not at this time however, one additional alternate route is being considered. If approved, the Etiwanda Terminal Alternative may provide an additional metering station at M.P. 84.2.

28-9 As indicated by the commentor, a different protocol for spill response will need to be developed for different individual areas along the route of the pipeline in order to ensure an adequate strategy for response. This is a significant undertaking in itself and, therefore, will be dealt with in the Oil Spill Contingency Plan rather than in the EIS/EIR. The Oil Spill Contingency Plan is a subsequent requirement which must be fulfilled by the project proponent prior to operation and has not yet been prepared.

COMMENT LETTER 28:
WHITE ROAD PROPERTY OWNER'S ASSOCIATION

Cajon Pipeline EIS/EIR
December 28, 1992
Page Three

. Define "P" of Legend on *Map of Utility Corridors*, Figure 4.8.1-4. Has this Area Plan for utility corridors (same page) been amended since 1980, the date cited on map? 28-14

. The EIS/EIR does not provide the characteristics of heated crude oil under pressure. In the *Letter of Comment* dated August 22, 1991 from Joyce Babicz, City Planner for Ontario, (see Appendices) a specific request was made (page 3) to describe the physical properties of crude oil at 140°F. Why was this omitted from the EIS/EIR? 28-15

. Is there data on how long it takes crude oil at 160°F to cool to ambient temperature? 28-16

. The *Design Criteria*, Table 2-1 of the *Notice of Preparation*, dated July 1, 1991 (see Appendices) provides crude oil characteristics using abbreviations that are not defined anywhere in the report. Please add these to Section 10.0. 28-17

. Is there data on the "flash-point" for heated crude oil? On Baldy Mesa Road there already exists a natural gas line and a jet fuel/gasoline line. In the event of major damage to all these pipelines in the immediate vicinity of the elementary school there, what would be the "worst-case scenario"? 28-18

. Section 5.12, *"System Safety & Reliability"*, does not specify heated crude oil statistics, historical analysis of "heated" pipeline spills or injury or death rates due to "heated" pipeline spills. None of the four (4) tables in this section dealing with accident data or injury/fatality projections specify "heated" oil pipeline. These tables, as such, are of no value in analyzing this project. 28-19

Finally, I find the process, as it stands to date, is willfully inadequate and flawed. The "published" notification of the scoping meetings in both 1991 and 1992, may have met a loose interpretation of NEPA and CEPA requirements, but fall far short of adequate public notice. Page 234 of the *California Permit Handbook* (Comparison of EIR/EIS Content: CEQA and NEPA Procedures), Notice of Completion (NOC) and Public Notice of Availability of the Draft EIR states "Public notice of availability ... and by one of three methods: 1) publication in a newspaper of general circulation; 2) posting on and off the project site in the area around the project; and 3) direct mailing to owners of property contiguous to the project site. 28-20

To quote the EIS/EIR for this project, page 1-5, "The Draft EIS/EIR will be made available for 60 days for public review and comment" is a sham intentionally designed to withhold 28-21

RESPONSE TO LETTER 28:

Since the Oil Spill Contingency Plan is an existing requirement intended to provide adequate procedures and measures for spill clean-up, it was determined that no further mitigation for spill clean-up needed to be provided in the EIS/EIR. It should also be noted that when the project is actually designed it will be possible to identify specific measures for individual locations through use of those data contained in this EIS/EIR which can be incorporated into the OSCP for responding and containing spills. Once, prepared a copy of the OSCP will be available for public review at the BLM office in Riverside.

28-10 All recorded cultural resource sites within or immediately adjacent (within 500 feet) to the proposed pipeline corridor were identified and evaluated. In compliance with accepted cultural resource protocol sites are listed by number only so as to not reveal their locations to the general public. The purpose of this is to help protect the sites from being vandalized or plundered. It is not accepted professional practice to publish site locations in a publicly distributed document such as an EIS/EIR.

28-11 Figure 3-2 is incorrect. The locations of the automatic check valves and the remote-operated block valves were transposed in Figure 3-2. This has been corrected for the Final EIS/EIR, which should make Table 3-1 and Figure 3-2 consistent.

28-12 Automatic check valves are shown in the wrong locations in Figure 3-2 due to the transposing of symbols (see preceding response). In actuality, automatic check valves will be located at many intervals along the entire length of the pipeline. Also, the pipeline would not be completely vulnerable in the event of a power failure (see response to comment 22-3).

28-13 Unfortunately, comparable data is not available for all faults. Some faults have been studied more than others. The faults along the path of the Cajon Pipeline have been studied more than most. For many faults, there has not been any historical activity, therefore, information is limited. The commentor should note some faults appear on more than one of the Tables (i.e., San Andreas, San Fernando, Chino, Whittier, Santa Susana) and, therefore, information about some faults can be correlated by examining and comparing all of the Tables. The commentor is correct, Table 4.1.5-1 is meant to provide information for the Pacific Pipeline route. The Draft EIS/EIR has been changed to clarify this.

COMMENT LETTER 28:
WHITE ROAD PROPERTY OWNER'S ASSOCIATION

information from the public and to hinder, in every possible way, public knowledge and review of this project. The Draft EIS/EIR has only been available to the public of the High Desert at the city offices in Adelanto during their business hours. Why wasn't the Draft EIS/EIR placed in the local public libraries as is customary with other projects? 28-21

Again, I appreciate the opportunity to comment on this project and draft report, and look forward to additional and/or replacement pages to this report as they are published.

Sincerely,

Linda Elkins

Linda Elkins, Secretary
White Road Property
Owners Association

attachment: Study Map

cc: Marsha Turoci,
County Supervisor, 1st District

RESPONSE TO LETTER 28:

28-14 "P" is a designated utility corridor under the BLM's California Desert Conservation Area (CDCA) Plan. The corridor currently contains two 115-kv power lines. The CDCA Plan has been reviewed annually and amended almost every year since 1980. The citation on this figure has been corrected.

28-15 The characteristics of Point Arguello Crude is as follows:

API Gravity	18-20
Sulfur Content	3.43% Wt.
Nitrogen Content	6.630 PPM
RVP	1.2 PSI
Pour Point	-5°
Viscosity @ 68°F	720 Centistokes
Vanadium & Nickel Content	297 PPM
Micro Carbon Residue	11.4% Wt.

28-16 The rate of cooling for crude oil from 160°F to ambient temperature depends on several factors:

1. Thermal conductivity of crude
2. amount of liquid disgorged, and
3. rate of flow from the pipe

Based on these factors, several assumptions are required to provide a general answer to the comment.

28-17 These additions have been made to the list of abbreviations.

COMMENT LETTER 28:
WHITE ROAD PROPERTY OWNER'S ASSOCIATION

RESPONSE TO LETTER 28:

28-18 The flash point of crude oil is 70°F in an enclosed container. In a volume open to the atmosphere, the flash point would be higher. If some catastrophic event occurred which caused the natural gas and fuel pipelines to rupture and ignite, a major explosion and fire could result. The rupture of the Cajon Pipeline as well would contribute to the magnitude of this event. Although crude oil is less volatile than natural gas or fuel, the heat and flame associated with a natural gas or fuel fire/explosion would certainly be sufficient to ignite any spilled crude oil. Any nearby sensitive uses (such as a school) would be exposed to a serious hazard in the event of a major pipeline rupture and explosion/fire. The existing gas and fuel lines are the more serious hazard compared to the proposed crude oil pipeline. The addition of the proposed pipeline could add to the overall magnitude of such a disastrous event, but this does not increase the likelihood of its occurrence. The proposed Cajon Pipeline Route has been re-routed around Baldy Mesa Elementary school in order to mitigate this potential impact. The new route follows Baldy Mesa Road south to Valencia Street where it then goes west to Beaver Street and continues south on Beaver Street to Yucca Terrace Drive. At Yucca Terrace Drive it travels east and then continues south on Baldy Mesa Road. The route is approximately 0.5 miles from the school property in all directions (see Appendix A, Map Sheet 8).

28-19 The accident and injury rates discussed in Section 5.12 of the Draft EIS/EIR are for all types of oil pipelines, including pipelines transporting heated crude oil. In collecting and analyzing data on pipeline spills, neither the DOT or EPA, which are our sources of this information, differentiate between heated or unheated crude oil pipelines. Those data illustrate that pipeline accident rates are very low compared to other methods of oil transport. Furthermore, it can be concluded that the resultant accident damage and injury are less severe. and pipelines which transport heated oil are no more subject to accidents than unheated lines. In the event of a spill, the heated crude oil has less potential to cause damage or injury because it is a less volatile substance than the mixtures of crude oil and "lighter" petroleum liquids which are used in unheated pipelines to make the oil flow more readily.

COMMENT LETTER 28:
WHITE ROAD PROPERTY OWNER'S ASSOCIATION

RESPONSE TO LETTER 28:

28-20 Three scoping meetings were conducted in separate locations. These meetings were advertised in newspapers serving the locale of each meeting. A notice was also placed in the Federal Register as required by NEPA. CEQA does not require that scoping meetings be held and does not contain provisions for providing public notice. Advertisement of the Notice of Completion was conducted in accordance with State requirements. The notice was placed in three newspapers of general circulation in Long Beach, San Bernardino and Hesperia in order to provide coverage of all areas along the route of the proposed pipeline.

28-21 The Draft EIS/EIR was officially available for a period of 60 days, however, comments have been accepted beyond the end of the 60-day period and responses have been provided for all comments received.

COMMENT LETTER 29:
GTE TELEPHONE OPERATIONS, WEST AREA

GTE

GTE Telephone Operations
West Area
585 N. Mountain Avenue
Ontario, CA 91762

Reply To

December 29, 1992

26409

United States Department of the Interior
Bureau of Land Management
Attn: Mr. Stephen L. Johnson
6221 Box Springs Blvd.,
Riverside, CA 92507-0714

Subject Draft (EIS/EIR)
CA-27497
1792, 2880
(CA-060.5)

The EIS/EIR for the Cajon Pipeline project has been reviewed.

GTE California Incorporated, has many communication facilities along the proposed pipeline route. The conflicts if any cannot be specifically identified without a clarified, detailed location map for the pipeline.

The telephone facilities that may need relocation could require up to an 18 month Engineering/Construction timeframe.

Relocation costs are the responsibility of the requesting party on an actual cost basis. 29-1

RECEIVED
BUREAU OF LAND MANAGEMENT
1992 DEC 31 PM 2 01
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

GTE Alaska Incorporated
GTE California Incorporated
GTE Hawaiian Telephone Company Incorporated
GTE Northwest Incorporated
A part of GTE Corporation

RESPONSE TO LETTER 29:

29-1 Comment noted. The precise alignment of the proposed pipeline has not yet been determined. As with other construction and development projects, final engineering and construction plans are typically not prepared until after the environmental evaluation has been completed. The pipeline company will provide notice of its proposed construction activities to local agencies in advance. Local agencies will also be provided additional information on construction details and scheduling prior to commencing construction.

COMMENT LETTER 29:
GTE TELEPHONE OPERATIONS, WEST AREA

Page 2 - 12/29/92
United States Dept. of Interior
Bureau of Land Management
Draft (EIS/EIR)
CA-27497
1792-2980
(CA-060.5)

The Cajon pipeline project encompasses five GTE Outside Plant Engineering Jurisdictions:

MAP / MP	AREA / CITY	CABLES COPPER/FIBER	GTE ENGINEERING OFFICE
13-17/78-96	RANCHO CUCAMONGA /ONTARIO	X / X	585 N. MOUNTAIN AVE., UPLAND, CA 91786
17-19/96-103	MONTCLAIR/POMONA DIAMOND BAR	X / X	1400 E. PHILLIPS BLVD., POMONA, CA 91766
19-21/103-120	SO. EL MONTE L.A. COUNTY, CITY OF INDUSTRY	X / X	554 E. SAN BERNARDINO RD. COVINA, CA 91723
21-23/120-132	L.A. COUNTY, MONTEBELLO, SO. GATE, DOWNEY PARAMOUNT	X / X	12905 E. LOS NIETOS SANTA FE SPRINGS, CA 90670
24-26/132-142	LONG BEACH	X / X	P.O. BOX 500, LONG BEACH, CA 90801

29-2

Should you have any additional questions, please feel free to call me at 909/949-8008.

Sincerely

E. F. HERNANDEZ
Operations Supervisor - OSP
Engineering

HR:LAMDMGT

RESPONSE TO LETTER 29:

29-2 Comment noted. No response required.

COMMENT LETTER 30:
COUNTY OF LOS ANGELES, DEPARTMENT OF PUBLIC WORKS

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS

THOMAS A. TIDEMANSON, Director

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (818) 458-5100

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

December 29, 1992

District Manager
Bureau of Land Management
6221 Box Springs Boulevard
Riverside, CA 92507-0714

Attention Cajon Pipeline Project

RESPONSE TO A DRAFT ENVIRONMENTAL IMPACT STATEMENT/
ENVIRONMENTAL IMPACT REPORT CAJON PIPELINE PROJECT

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the proposed Cajon Pipeline Project. We have reviewed the Draft EIS/EIR and offer the following comments:

Current estimates indicate that a shortfall in permitted daily land disposal capacity in Los Angeles County will occur within the next five years. Any new development resulting from the construction of the proposed project and the demolition of existing structures will increase the generation of solid waste and will negatively impact the existing solid waste management facilities in the County. As such, mitigation measures must be employed to address this concern. These measures may include, but are not limited to, development of new or expansion of existing landfill sites, as well as implementation of waste reduction and recycling programs. 30-1

The existing hazardous waste management facilities (HWM) in this County are inadequate to handle the hazardous waste currently being generated. The proposed development may generate hazardous waste or contaminated soil, which could adversely impact HWM facilities. This issue should be addressed and mitigation measures provided. 30-2

The EIS/EIR should assess the impact on the quality of stormwater as the result of the project. The document should reference National Pollutant Discharge Elimination System (NPDES) Permit CA0061654, issued by the Regional Water Quality Control Board to respective local agencies. The document should indicate that the project will comply with all the stormwater quality management programs of the local agencies. 30-3

RESPONSE TO LETTER 30:

30-1 Comment noted. Construction of the proposed project would result in minimal generation of material (building construction wastes and excess fill material) that would need to be disposed of in a landfill. Disposal will occur consistent with state and local regulations.

30-2 See response to Comment 30-1.

30-3 Comment noted. The National Pollutant Discharge Elimination System (NPDES) program is the principal mechanism adopted by the Clean Water Act to regulate discharges of pollutants to navigable waters from point sources. Under the Clean Water Act any construction activity including clearing, grading and excavation activities greater than five acres is required to file an NPDES permit. Mitigation measure 5.2.1-1 has been revised to incorporate the requirement for a National Pollutant Discharge Elimination System (NPDES) permit and compliance with storm water quality management programs of the local agencies.

5.2.1-1(e) *A National Pollutant Discharge Elimination System (NPDES) permit shall be obtained from the RWQCB for grading of the pipeline right-of-way and construction at Cajon Terminal and the Adelanto Pump Station. Construction shall also comply with storm water quality management programs of the respective local agencies.*

COMMENT LETTER 30: COUNTY OF LOS ANGELES, DEPARTMENT OF PUBLIC WORKS

District Manager
December 29, 1992
Page 2

Any mitigation measure monitoring program performed by the Los Angeles County Department of Public Works, Waste Management Division, will require a funding account to be established by the project proponent to pay for the required services. The amount of necessary funds will be determined at the time monitoring will be performed. The Department of Public Works, Waste Management Division, must be contacted to establish the account. 30-4

If you have any questions regarding these comments, please contact Ms. Guita Sheik of our Waste Management Division at (818) 458-5183. Questions regarding the environmental reviewing process of this Department can be directed to Ms. Clarice Nash at the previous page address or at (818) 458-4334.

Very truly yours,

T. A. TIDEMANSON
Director of Public Works

for CARL L. BLUM
Assistant Deputy Director
Planning Division

MA:my
#2/187

RESPONSE TO LETTER 30:

30-4 Comment noted. Waste disposal monitoring by the Los Angeles County Department of Public Works, Waste Management Division is not anticipated at this time.

COMMENT LETTER 31: CITY OF FONTANA

City of Fontana
CALIFORNIA

December 29, 1992

Bureau of Land Management
Attn: Stephen L. Johnson
6221 Box Springs Blvd.
Riverside, CA 92507-0714

Subject: Cajon Pipeline Draft EIR/EIS, City of Fontana comments

Dear Mr. Johnson:

Thank you for the opportunity to comment on the Draft EIR/EIS for the Cajon Pipeline Project. The following is a list of concerns from the City of Fontana that should be addressed and read into the record during the public hearing.

1. The pipeline route as noted in Figure 3-1(B) would traverse the City of Fontana along the I-15 freeway along the City's western boundary with a 20 inch steel line that would gradually have 30 to 48 inches of cover. Final project design needs to take into account Fontana's proposed sewer and storm drain facilities contained in the City's master plans. Of particular concern is the proposed I-15/Route 30 interchange and Highland Avenue Channel. The project needs to be designed not to interfere with Fontana's proposed utilities. 31-1

2. Construction within the City of Fontana's controlled rights-of-way will require the normal permit processing and preparation of a traffic control plan and construction schedule. Construction noise must be within the limits established by the Fontana General Plan and Development Code. In short, necessary Fontana permits shall be secured including detailed traffic control plan for any roadway area construction or crossing. 31-2

3. Soil erosion during wind storms and rain must meet local and state standards including securing of a NPDES permit pursuant to the Clean Water Act. 31-3

8353 SIERRA AVENUE (P.O. BOX 518) • FONTANA, CALIFORNIA 92334-0518 • (714) 350-7800
SISTER CITY — KAMLOOPS, B.C. CANADA

RESPONSE TO LETTER 31:

31-1 Construction plans for the pipeline will be designed to minimize impacts to both existing and planned infrastructure and public facilities. When plans for the precise alignment of the pipeline are prepared, each affected agency will be consulted and the as-built plans for all existing infrastructure which could potentially be affected by the proposed project will be reviewed. It should be possible to establish an alignment for the pipeline which avoids interference, even temporarily, with almost all existing and planned subterranean infrastructure. Refer to mitigation measure 5.8.1-1.

5.8.1-1(b) *The alignment of the pipeline will be designed to minimize or avoid interference with plans, policies and existing and planned infrastructure during its construction. All affected agencies will be consulted regarding the precise alignment of the pipeline within their respective jurisdictions in order to minimize or avoid interference with existing and planned infrastructure and public facilities.*

31-2 Comment noted. Table 1-2 of the Draft EIS/EIR, "Approval Requirements for the Cajon Proposal", indicates that local permits must be obtained before project construction may commence.

31-3 Comment noted. The proposed project will need to comply with all applicable local, state, and federal rules and regulations. Refer to mitigation measure 5.2.1-1(e).

31-4 The construction of the pipeline project will include restoring the ground surface to its natural condition. Mitigation measures 5.3.1-3(b) and 5.3.1-3(d) describe the methodologies for restoring the soil and revegetating the area after construction is completed. The possibility of utilizing the pipeline right-of-way for recreational trail purposes can be investigated with the pipeline owner. It should be noted that the pipeline will be aligned in existing streets and other right-of-ways to greatest extent possible as it traverses urbanized areas. In the Fontana area, the additional right-of-way which is expected to be acquired will primarily be located immediately adjacent to the edge of the Interstate 15 right-of-way. The desirability of locating a recreational trail along such a route would need to be evaluated.

COMMENT LETTER 31: CITY OF FONTANA

Letter - December 29, 1992
BLM - Cajon Pipeline
Page 2

4. The precise right-of-way is unclear as up to 10 to 50 feet of permanent right-of-way is required; therefore, there is a potential for one more barren utility corridor crossing upper Fontana. The construction zone will have a 10 foot width. To mitigate the adverse environmental effect, mitigation shall include restoring ground to natural cover and developing a plan with local jurisdictions for joint use trails so that the pipeline right of way will not become another barren utility corridor through an urban area. 31-4

5. The analysis of Existing Land Uses of the Draft EIR/EIS is inaccurate. Specifically, on Page 4.7-11 of the Draft EIR/EIS under the heading City of Fontana, the statement "there are no sensitive receptors", is incorrect as the approved Hunter's Ridge Specific Plan has multi-family residential and single family residential land use designations adjacent to the proposed Cajon Pipeline. Additionally, the City of Fontana is not mentioned in Table 4.7.1-1 "Land Use Requirement for the Cajon Pipeline". Correct the statements made on page 4.7-11 of the Draft EIR/EIS to include accurate information, include the City of Fontana in table 4.7.1-1, and provide mitigation measures to offset the negative environmental affect of the pipeline adjacent to high density residential land uses. 31-5

6. The oil spill contingency plan shall be reviewed and commented on by the City of Fontana prior to operation of the pipeline. 31-6

7. The City of Fontana believes that the mitigation measures for Cultural and Paleontological Resources outlined on page 2-41 of the Draft EIR/EIS should be expanded to include monitoring of the area within the City of Fontana and Fontana's Sphere of Influence by a certified/trained archaeological monitor under the supervision of a certified Principal Investigator. A qualified paleontologist shall also be on site during construction to perform inspections of excavation and to salvage exposed fossils. Both the archaeological monitor and the paleontologist shall have authority to halt excavation. In addition to required information reporting, documentation of all material located and information curated within Fontana's Sphere of Influence in accordance with Federal Standards shall be forwarded to the City of Fontana. Monthly reports to the City of Fontana's Historical Preservation Commission during construction within the City of Fontana is necessary. 31-7

8. Provide a mitigation monitoring program per CEQA requirements that includes submission of reports to the City of Fontana. 31-8

RESPONSE TO LETTER 31:

31-5 The statement on page 4.7.1-1 of the Draft EIS/EIR indicating there are no sensitive receptors within 1,500 feet of the pipeline route refers to existing conditions. Currently, there are no existing residential land uses in the vicinity of the pipeline route as it passes through the City of Fontana. The residential uses planned in the Hunter's Ridge Specific Plan near the pipeline route will be constructed sometime in the future and do not currently exist. Section 5.7 of the Draft EIS/EIR describes impacts to nearby land uses. Primary land use impacts will occur during the period of pipeline construction (two to five days in any single location). The primary impact which could potentially affect nearby land uses after the pipeline is operational is an oil spill. The likelihood of an oil spill occurring and the procedures for containing and cleaning up a spill are described in the Draft EIS/EIR. There are no significant adverse effects associated with locating the pipeline near residential uses other than those described in the Draft EIS/EIR. Therefore, no additional mitigation is necessary. Table 4.7.1-1 has been modified to include the city of Fontana.

31-6 The oil spill contingency plan is subject to review and approval by the BLM, as well as the U.S. Environmental Protection Agency and/or the Department of Transportation's office of Pipeline Safety under the authority of the Oil Pollution Act of 1990. A copy of the plan can be provided to the city of Fontana.

31-7 The area within the City of Fontana has been designated as having a high potential for paleontological resources. Mitigation Measure 5.11.1-2 (a) recommends that a qualified paleontologist be retained to perform inspections of excavation within areas designated as having a high potential.

31-8 Monitoring and reporting of mitigation measures will be the responsibility of the lead agencies (U.S. Bureau of Land Management and the City of Adelanto). The City of Fontana can contact the lead agency to request monitoring reports. It should be noted that the only mitigation that will be required to offset impacts to the City of Fontana will occur during the relatively short period of pipeline construction.

COMMENT LETTER 31:
CITY OF FONTANA

Letter - December 29, 1992
BLM - Cajon Pipeline
Page 3

The City of Fontana appreciates the opportunity to comment, and the City hopes that the above mentioned issues will be addressed prior to adoption of the EIR/EIS.

If you have any questions or concerns, please feel free to contact Dennis L. Woods, Associate Planner, at (909) 350-6726.

Sincerely,

COMMUNITY DEVELOPMENT DEPARTMENT

Greg Malinzer
Community Development Director

GM:DLW:jb

cc: Building & Safety/Planning Manager
Deputy Planning Manager
Senior Planner (CB)
Associate Planner (DLM)/ File: 0610-60 Cajon Pipeline EIR/EIS

RESPONSE TO LETTER 31:

COMMENT LETTER 32:
CALIFORNIA PUBLIC UTILITIES COMMISSION

STATE OF CALIFORNIA PETE WILSON, Governor

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO CA 94102-3298

December 30, 1992

Bureau of Land Management
ATTN: Stephen L. Johnson
6221 Box Springs Blvd.
Riverside CA 92507-0714

RE: Comments on Draft Environmental Impact Statement/Report (EIS/EIR) for the Proposed Cajon Pipeline Project

Dear Mr. Johnson:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Report for the Proposed Cajon Pipeline Project ("the Draft EIR").

In February and June of this year, we informed the Lead Agency under the California Environmental Quality Act (CEQA), the City of Adelanto, and yourself, respectively, that the California Public Utilities Commission (CPUC) regulates interstate common carrier pipelines, in accordance with Public Utilities Code Section 219, and that Cajon Pipeline Company must obtain authority to operate as such from the CPUC.[1] Such authority is discretionary in nature and would require the CPUC to comply with CEQA in considering the granting of it. Unfortunately, there is no reference to this requirement in the Draft EIR. Reference must be included in Section 1.3 (p. 1-5), "Non-Federal Policies, Plans and Programs," and in Table 1-2, "Approval Requirements for the Cajon Proposal." 32-1

Due to this jurisdiction, the CPUC is serving as Lead Agency under CEQA for the Pacific Pipeline Project proposed by Pacific Pipeline Systems, Inc., which is included as an alternative in the Draft EIR. We are currently preparing the Draft EIR for this project, which likewise includes the Cajon Pipeline Project as an alternative, and are fortunate to be able to reference the Draft EIR in our description and analysis.

The following additional comments are based upon the CPUC's experience in, and requirements for, the CEQA analysis of pipeline projects, our more generalized (i.e., not localized)

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1 Letters of February 18, 1992, to Jack Chapman (City of Adelanto) and June 1, 1992, to Steve Johnson (Bureau of Land Management) from Martha Sullivan.

RESPONSE TO LETTER 32:

32-1 Reference to the authority of the PUC has been made in Section 1.3

COMMENT LETTER 32: CALIFORNIA PUBLIC UTILITIES COMMISSION

Mr. Johnson
December 30, 1992
Page 2

needs as a statewide responsible agency and an emphasis on the long-term impacts and operations of the common carrier pipeline, given the nature of the CPUC's regulatory authority. We have not checked your characterization of the Pacific Pipeline Project using the Proponent's Environmental Assessment (PEA), since our analysis is still underway (using additional information gathered since the PEA was published in late 1991). Once our detailed analysis is complete, your alternative analysis may need to be updated.

1. Overview: We are concerned with the overall level of information and analysis in this Draft EIR, which appears to be at a fairly general level. With some exceptions, we consider the level of information and analysis in this Draft EIR inadequate for the CPUC's purposes in meeting CEQA's objectives to:

a. Disclose to decision makers and the public the significant environmental effects of proposed activities.

b. Identify ways to avoid or reduce environmental damage. 32-2

c. Prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.

d. Foster interagency coordination.

e. Enhance public participation.

Specific comments illustrating this overarching concern follow.

2. Project and Alternatives Description (Chap. 3)

A. There is no description of the facilities upstream from the proposed project (i.e., sources of crude to be transported). Although these facilities may be largely existing, they are fundamental to the proposed project's ability to meet its stated objectives and must be considered in the environmental analysis of the project. 32-3

B. There is no description of the proposed project's pressure reduction station, listed as one of the "major components." (DEIR, p. 3-1) Only by inspecting the strip maps in Appendix A could its location be found (Sycamore Canyon at MP 73, Map 11 of 26). Just as descriptions and plot plans are provided for the Cajon Terminal and Adelanto Center, similar information must be provided for this pressure reduction station, which must also be considered in the environmental analysis of the Project. 32-4

C. There is no description of the facilities downstream from the proposed project (i.e., receiving stations and destinations of crude to be transported). Although these facilities may be largely existing, they are fundamental to the proposed project's 32-5

RESPONSE TO LETTER 32:

32-2 Specific comments of the PUC are addressed below in the following responses. However, it must be noted that CEQA also requires that the environmental impact report be analytic rather than encyclopedic (Section 15006), and that the evaluation of environmental effects of a proposed project need not be exhaustive (Section 15151).

32-3 Additional information on the upstream facilities has been included in Section 3.2.1 of the Final EIS/EIR.

32-4 The pressure reduction station is described in Section 3.2.1 of the Final EIS/EIR.

32-5 Additional information on the downstream facilities has been included in Section 3.2.1 of the Final EIS/EIR.

COMMENT LETTER 32: CALIFORNIA PUBLIC UTILITIES COMMISSION

Mr. Johnson
December 30, 1992
Page 3

ability to meet its objectives and must be considered in the environmental analysis of the project. 32-5

D. A common objective of the Project and "Marketing Alternatives" is to offer pipeline transport of oil produced in the Santa Barbara Outer Continental Shelf to the Southern California refineries. However, the Project and Alternative Descriptions do not specify how this objective will be accomplished beyond delivery to Hynes Station and GATX Carson terminals where "arriving oil would be taken to storage or diverted directly to a connecting carrier's pipeline." (DEIR, p. 3-13) Pacific Pipeline's proposal to deliver crude to Chevron's El Segundo, Exxon's Wilmington and GATX's Carson refineries is not mentioned. In order to adequately compare these alternatives, their respective plans to accomplish the stated objectives of the Project must be clear and specific. 32-6

E. There is no description of the requirements of the proposed project (or Alternatives) for energy, utility and public services during construction and operation. (See comment 3.A re: lack of environmental analysis of these issue areas.) 32-7

F. There is no description (for the proposed project or Alternatives) of the project lifespan and decommissioning, which must be considered in the environmental analysis. 32-8

G. One obvious correction needed to the Pacific Pipeline Alternative description is to Figure 3-14, which does not show the El Segundo Branch included in the Proponent's Environmental Assessment. 32-9

3. "Affected Environment" (Chap. 4):

A. <u>No baseline/setting is provided for several Issue Areas</u> standard to the CPUC's environmental analysis: Energy[2], Environmental Contamination[3], Public Services[4], 32-10

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2 Section 4.8, "Utilities," provides information on the utility lines which would parallel or be crossed by the proposed project, but none about the sources of energy to fulfill the project's requirements.
3 The first mention of this issue is in impacts analysis at p. 5.1-5.
4 Section 4.8, "Utilities," provides information on the utility lines which would parallel or be crossed by the proposed project, but none about the sources of public services (telecommunications, water, sewer, waste disposal, police, fire etc.) to fulfill the project's requirements.

RESPONSE TO LETTER 32:

32-6 See Response to Comment 32-5.

32-7 See Response to Comment 32-10.

32-8 Information pertaining to the decommissioning of the pipeline was omitted from the Draft EIS/EIR. Information is included in Section 3.2.4 of the Final EIS/EIR.

32-9 This correction has been made to Figure 3-14.

32-10 The determination of issues to be addressed by the EIS/EIR preparers was made by the CEQA and NEPA lead agencies. Information on energy requirements has been included in Response to Comment 44-27. Information on contaminated sites and review of the Cortese List has been undertaken. Refer to response to Comment 35-10. Public services, such as water and sewer will be provided to the Adelanto Pump Station by the way of Adelanto. These services already exist. Recreational areas in the USFS are documented in Section 4.7. The information required for the System Safety analysis can be found in Section 5.12.this information we feel is adequate to provide a basis for the determination of the system's safety.

COMMENT LETTER 32: CALIFORNIA PUBLIC UTILITIES COMMISSION

Mr. Johnson
December 30, 1992
Page 4

Recreation[5] and System Safety and Reliability. We disagree with the note regarding inapplicability of baseline requirement for System Safety and Reliability (Id., p. 4.12-1), and consider the appropriate baseline for subsequent impacts analysis to include:

1) Baseline hazards/safety conditions that exist along the proposed and alternative routes;

2) The physical properties of the various crudes that will be transported via the proposed and alternative pipelines as they relate to potential hazards;

3) A summary of hazards that currently exist for the oil facilities that could tie into the proposed and alternative pipelines;

4) Existing emergency response capabilities within the communities that will be affected by the pipeline; and

5) Federal, State and local regulations that would apply to the proposed and alternative pipelines.

Some of this information is present in Chap. 5, "Environmental Consequences," and should be moved and expanded. (I.e., Regulations, "Historical Analysis of Pipeline Spills," and "Public Safety.") 32-10

B. Gaps in baseline/setting information provided include:

1) A complete regulatory framework should be provided for all Issue Areas, not just Air Quality, Noise (limited), Visual Resources (limited to federal policy), Land Use, and Utilities (limited to federal policy). 32-11

2) The baseline for Cultural Resources does not clearly address historical resources, as distinct from the archaeological resources cited. 32-12

3) The baseline for Geology does not address seiches -- seismically generated standing waves occurring within small bodies of water and enclosed inlets, and which may occur in large petroleum storage tanks. 32-13

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5 This issue is only addressed for the Mobil Line 70 alternative, at p. 4.7-15, although reference is made to impacts on recreational areas in impacts analysis (p. 5.7-3 and 5.9-11).

RESPONSE TO LETTER 32:

32-11 A regulatory framework was provided where it directly related to the assessment or determination of the impact to the environmental area of concern. Regulatory requirements are addressed where permitting would be required.

32-12 A historic background is provided in more detail in Chapter 4-11. From the archival records review, one site was identified as historic within Los Angeles county while the majority of sites within San Bernardino County were of historic origin.

32-13 No petroleum tanks presently exist. However, baffles are typically built into tanks in areas where severe ground shaking may occur. This along with floating tank roofs reduce the wave (seiche) effect. Since these are standard engineering design features in seismicly active areas, seiches within such facilities were not identified as an issue during scoping and we do not feel that a discussion of a seiche in a baffled tank, further contained by a floating roof would enhance understanding of this project. Therefore, no baseline data on a seiche within a crude oil storage tank is included.

COMMENT LETTER 32:
CALIFORNIA PUBLIC UTILITIES COMMISSION

Mr. Johnson
December 30, 1992
Page 5

4) The baseline for Soils does not provide a context for lay understanding/evaluation of the "shrink-swell" "Engineering Characteristic" cited for soil series in Table 4.1.1-2. Additionally, these "Engineering Characteristics" should be clearly referenced in the narrative -- they are very helpful. 32-14

5) The baseline for Soils does not specify agricultural conditions (productivity, disease), although agriculture land use is cited in Chap. 5 (e.g., at p. 5.10-2). 32-15

6) The baseline for Socioeconomics does not include businesses/economic uses in the immediate vicinity of the pipeline which could be affected by construction and operation. 32-16

3. Environmental Consequences (Chap. 5)

A. The "Standards of Significance" seem to rely on "professional judgment" and CEQA Guidelines Appendices, with little reference to thresholds of significance developed by local agencies, government codes and ordinances, or requirements stipulated in state statutes. No Standards of Significance for System Safety and Reliability are cited. 32-17

B. The information gaps identified in Comments 2 (Project/Alternatives Description) and 3 (Affected Environment) must be incorporated into the analysis of impacts and adequately addressed in this Chapter. Additional impacts which must be considered are:

1) Strong Ground Shaking on above-ground facilities. 32-18

2) Incremental Changes in Existing Operations, e.g.:

a. Change in Existing Facilities/Operations As described in "Purpose and Need for the Project" (at pp. iv-v), this project will result in a significant increase in the volume of heavy crude transported in the All-American Pipeline (from Santa Barbara County) and from the San Joaquin Valley (SJV). The prospect of incremental changes in existing facilities (pump stations, heater stations, storage, etc.) due to this increased volume and different characteristics of OSC and SJV heavy crude must be explored and this question addressed. The fact that these facilities are already permitted does not obviate this need; changes must be disclosed to decision-makers. 32-19

b. Refinery Changes Crude oil produced offshore Santa Barbara County is known to have higher sulfur content than the average sulfur content of the crudes (from 32-20

RESPONSE TO LETTER 32:

32-14 Comment noted. The discussion of soil characteristics has been provided within Section 4.1 for the lay-reader.

32-15 The proposed project does not cross any agricultural lands under production. This was incorrectly referenced in Chapter 5 and has been corrected.

32-16 It is not necessary to be exhaustive and name the businesses which would be affected by pipeline construction and operation. However, without becoming encyclopedic, they are to be found along First Street in Pomona, Business Parkway, Fairway Drive in the City of Industry, Don Julian Road, and 7th Avenue.

32-17 Refer to response to Comment 35-112.

32-18 Mitigation Measure 5.1.1-1 has been revised to include seismic hazards resulting from ground shaking on above-ground facilities.

32-19 There is no difference in the crude characteristics, as AAPL is currently transporting this same crude oil. There also will be no changes required or made by AAPL in pumps, heaters or associated facilities to accommodate the volume. The volumes were estimated to be 300,00 BPD and the only change is in the time table to ramp up to these volumes.

32-20 Refineries are currently processing this crude as it is tankered and barged into Los Angeles at the present time. There will be no incremental changes to refinery operations. See response to comment 32-5.

COMMENT LETTER 32: CALIFORNIA PUBLIC UTILITIES COMMISSION

Mr. Johnson
December 30, 1992
Page 6

various sources) refined in Los Angeles. The prospect of incremental changes in existing refinery operations due to the different characteristics of heavy crude (OSC or SJV) to be transported by the Cajon Pipeline must be explored and this question addressed. 32-20

C. As indicated in Comment 1, we are concerned that the level of information and analysis in the impact analysis and mitigation measures does not afford a reasonable basis for use of the EIR by responsible agencies.

1) In numerous instances, such as the following examples, the evaluation of impacts in the Draft EIR is largely deferred to a later date [which was found unacceptable in Laurel Heights Improvement Assoc. v. Regents of the Univ. of California, 47 Cal. 3d 376 (1988)]: 32-21

a. Impact 5.1.1-3 (at p. 5.1-4): "Final determination of the liquefaction potential and selection of the most appropriate mitigation effort will require evaluation of site specific liquefaction potential during site specific design of the pipeline." This statement is not even included in the mitigation measures, although it is clearly intended to mitigate this admitted "hazard." 32-22

b. Impact 5.1.1-5 (at p. 5.1-5): "The potential for encountering contaminated soil which may present a hazard to worker health and safety is considered to be high through the southern portion of the route ... This is a potentially significant impact." As noted earlier, there is no baseline provided for even this high-level statement. The proposed mitigation (5.1.1-5(a)) is "Additional studies ... performed prior to construction to identify contaminated soil sites within the construction rights-of-way." and excavation, treatment and disposal at a registered landfill of any contaminated soils encountered (5.1.1-5(b)). 32-23

c. Impact 5.2.1-6 (at p. 5.2-8): "The pipeline could be exposed to scour and natural changes in the stream's channel morphology over its operational life." The analysis consists of concluding that "This potential would be limited by burying the pipeline below the 100-year scour depth with an additional six feet of cover," encasing it in concrete, and laying a "concrete blanket" at critical locations. Scour depth (and therefore the impacts and effectiveness of this proposal) would be determined for "all major stream crossings" as a mitigation. 32-24

RESPONSE TO LETTER 32:

32-21 In all instances the level of impact has been evaluated and this is stated within the text of the discussion. The impacts and mitigation measures recommended are commensurate with the level of detail available at this point. The specific cases for which the commentor states that impact evaluation has been deferred are addressed in the following comments.

32-22 Areas of liquefaction potential are identified within the discussion of the impact. The specific mitigation measure used for specific locations is dependent upon the local conditions. Requirements for engineering review of liquefiable areas and determination of appropriate design has been incorporated into the mitigation measure. Mitigation measure 5.1.1-3 has been revised as follows:

5.1.1-3 *The pipeline route between M.P. 62 and M.P 85 and M.P. 120 and M.P. 142 shall be reviewed to determine the location of the ground water table, the characteristics of underlying soil and hence the most appropriate measure to reduce liquefaction potential or provide protection of the pipeline from soil liquefying. These measures may include but would not be limited to:*

(a) use of stone/gravel columns to improve dissipation characteristics and increase density of soil where appropriate, or

(b) concrete coating the pipeline to prevent pipe rising out of the ground.

32-23 Baseline data for known contaminated sites as contained in the Cortese List has been reviewed. The results of this review has been included in Section 4.1 and 5.1.

32-24 The impact of upset of the pipeline from exposure has been recognized as a significant issue. The information which is to be determined is the most appropriate depth at which burial must occur. Mitigation ensures that the engineering design for this pipeline would be below the depth which would be exposed.

COMMENT LETTER 32: CALIFORNIA PUBLIC UTILITIES COMMISSION

Mr. Johnson
December 30, 1992
Page 7

d. Impact 5.3.1-8/Mit. 5.3.1-8 (at p. 5.3-8): "A focused survey of the zebra-tailed lizard populations along the pipeline route shall be conducted to ascertain whether the direct impact area of the ROW could affect them and whether population levels are adequate to ensure recolonization of the ROW following revegetation. If no impact occurs or if population levels are adequate, no further mitigation will be implemented; if they are not, additional specific mitigation measures will be developed in consultation with responsible agencies and implemented." This plainly defers the evaluation of this impact. 32-25

2) CEQA § 21081.6 requires the adoption of a mitigation reporting or monitoring program "designed to ensure compliance during project implementation." In order to be effective, mitigation measures should include the following components:

a. The objective of the mitigation measure and why it is recommended.

b. The specifics of the mitigation measure and how it will be designed and implemented, including performance standards by which the success of the mitigation can be determined and "contingent" mitigation if monitoring reveals that the success standards are not satisfied.

c. The agency, organization, or individual responsible for implementing the measure.

d. The specific location of the mitigation measure.

e. The schedule for implementation. 32-26

Mitigation measures calling for further studies, monitoring or agency coordination not tied to a specific action plan as just described, such as the following examples from the Draft EIR, are not designed to ensure compliance and should be avoided:

5.1.1-1(c) (at p. 5.1-1): "Remotely operated automatic block valves shall be located at active fault crossings as shown in Table 3-1." This mitigation does not describe how it will reduce the impact. Additionally, we suggest that this mitigation measure include controlled shutdown if rupture occurs, and that automated block and check valves be located on both sides of the fault crossing. 32-27

RESPONSE TO LETTER 32:

32-25 This impact has been evaluated to be significant. Information pertaining to population demographics and distribution could not be obtained at the time of general reptile surveys. Mitigation for impacts on the zebra-tailed lizard may include the following measures: avoidance of the population, avoidance of the peak season activity or successful revegetation. These mitigation measures require that the population in the vicinity of the ROW be mapped in detail prior to the onset of construction and site preparation. It is in no way different to mitigation normally required for the desert tortoise. Mitigation measure 5.3.1-8 has been revised to more accurately reflect this recommendation.

5.3.1-8 *A focused survey of the zebra-tailed lizard populations along the pipeline route shall be conducted to ascertain the zebra-tailed lizard distributions and population mapping in the vicinity of the pipeline ROW in the Cajon and Lytle Creek Washes. If population levels are found adequate to ensure recolonization of the ROW following revegetation or population mapping demonstrates that the population are distant from the ROW then no further mitigation will be implemented; if they are not, additional specific mitigation measures will be developed in consultation with CDFG and USFWS and be implemented.*

32-26 The mitigation monitoring program, including measures to be implemented, timing and responsibilities is presented in Section 3 of Volume II of the Final EIS/EIR.

32-27 Controlled shutdown and the location of automated check valves have been included within this mitigation measure.

5.1.1-1(c) Remotely operated automatic block valves shall be located at either side of active fault crossings, as shown in Table 3-1 of the Final EIS/EIR.

5.1.1-1(d) *An Oil Spill Contingency Plan approved by Lead Agencies shall include emergency plans for rupture of the pipeline at fault crossings and controlled shutdown of the pipeline in event of a rupture. This plan shall be reviewed by the Emergency Response Review Committee. The committee shall provide recommendations to the Lead Agencies for implementation of the plan. This plan shall be finalized and approved by the Lead Agencies (BLM, USFS, and the City of Adelanto).*

COMMENT LETTER 32: CALIFORNIA PUBLIC UTILITIES COMMISSION

Mr. Johnson
December 30, 1992
Page 8

5.1.1-4 (at p. 5.1-5): "An erosion and sedimentation control plan, a component of the OSC Plan, shall be submitted to the appropriate governmental agencies ..." 32-28

5.3.1-3(a) (at p. 5.3-4): "A pre-construction meeting, to be attended by project management staff, site foremen, and a qualified biologist, revegetation specialist or biological monitor, shall be held at which avoidance and minimization of vegetation impacts both within the ROW and outside it would be discussed." While discussion is a good first step, how will the impacts actually be reduced? 32-29

5.3.1-3(b) (Id.): "Sensitive plant communities shall be avoided during construction." How? (Where are they? How will they be identified by workers? How will they be protected?) 32-30

5.3.1-3(f) (Id.): "Use of the ROW in creosote and saltbrush scrub shall be limited to crushing when possible and ... located adjacent to existing disturbance where feasible." What are the criteria for judging possibility and feasibility? 32-31

5.3.1-4(a) (at p. 5.3-5): "A map of the proposed staging area and turnarounds for the northernmost 25 miles of the pipeline route shall be submitted to the BLM before construction is initiated." Then what? 32-31

5.3.1-5(a) (at p. 5.3-7): "A survey for the western spadefoot toad shall be carried out in suitable areas between February and April." Specifically, what are "suitable areas" and what year will this be done in? Given that the next measure calls for rerouting of the ROW should the species be found, and "Final Design for Construction" is planned in February - October, 1993, presumably this needs to happen in 1993 in order to be effective. Is this feasible, or should this be undertaken as part of the Final EIR preparation (Section 7 consultation pending)? 32-33

3) The Draft EIR does not discuss whether there are any significant side-effects of the proposed mitigation measures, as required by CEQA Guidelines § 15126. 32-34

4) Has the CEQA Lead Agency complied with CEQA § 21151.4 (eff. 1989) (or does it plan to)?

"No (EIR) or negative declaration shall be approved for any project involving the construction or alteration of a facility within one-fourth of a mile of a school which might reasonably be anticipated to emit hazardous or 32-35

RESPONSE TO LETTER 32:

32-28 Mitigation measure 5.1.1-4 has been revised as follows:

5.1.1-4 *An erosion and sedimentation control plan, a component of the COM Plan, shall be submitted to BLM and USFS and the City of Adelanto., as specified in Mitigation Measure 1-1. This element shall be reviewed by the Erosion and Sediment Control Review Committee. The committee shall provide recommendations to the Lead Agencies for implementation of the element.*

32-29 Mitigation measure 5.3.1-3 has been revised per comments received by other agencies. Discussion and education of the construction management team in this instance is a way in which damage to the sensitive environments can be reduced through knowledge of areas which should be avoided. A number of mitigation measures under 5.3.1-3 have been recommended to reduce impacts to native vegetation. One mitigation measure alone will not be effective. It requires a number of measures such as has been recommended. Refer to mitigation measures 5.3.1-3 (b) through (g).

5.3.1-3(a) *A pre-construction meeting, to be attended by the project management staff, site foremen, a qualified biologist, and biological monitor, shall be held. At this meeting avoidance and minimalization of vegetation impacts, both within and outside the ROW, will be discussed to ensure that the construction management team are aware of sensitive areas and are educated in areas to be avoided, and means of reducing impacts.*

32-30 Refer to response to Comment 6-13 and 32-29.

32-31 This mitigation measure has been revised as follows:

5.3.1-3(f) *Use of the ROW in creosote and saltbush scrub shall be limited to crushing where topography allows, and when no fill or excavation is required. Disturbances for individual activities, such as lay-down, maintenance, etc. shall be located adjacent to each other within the ROW to minimize concentrated disturbances.*

32-32 Mitigation measure 5.3.1-4(a) has been revised as follows:

COMMENT LETTER 32:
CALIFORNIA PUBLIC UTILITIES COMMISSION

Mr. Johnson
December 30, 1992
Page 9

acutely hazardous air emissions, or which would handle acutely hazardous material or a mixture containing acutely hazardous material in a quantity equal to or greater than the quantity specified in subdivision (a) of § 25536 of the Health and Safety Code, which may pose a health or safety hazard to persons who would attend or would be employed at the school, unless both of the following occur:

"(a) The lead agency preparing the (EIR) or negative declaration has consulted with the school district having jurisdiction regarding the potential impact of the project on the school.

"(b) The school district has been given written notification of the project not less than 30 days prior to the proposed approval of the (EIR) or negative declaration." 32-35

5) Has the CEQA Lead Agency complied with amendments to CEQA § 21104 and 21153 (eff. 1991), which require a lead agency to consult with, or obtain comments from, any city or county which borders on a city or county within which the project is located (unless otherwise designated annually by agreement between the lead agency and the city or county), prior to completing an EIR? 32-36

5. Mitigation Monitoring Program (Chap. 7.5)

A. Please refer to our Comment 3.C.2) regarding the components required to fulfill CEQA § 21081.6's mandate for a mitigation reporting or monitoring program "designed to ensure compliance during project implementation." In addition to those elements, the mitigation monitoring/reporting program should specify how monitors will be coordinated and by whom and include specific reporting requirements, such as field visit verification reports. 32-37

B. Given that CEQA does not confer any additional power to impose or carry out mitigation measures, we would like to point out that the CPUC's statutory authority over common carrier pipeline corporations offers a comprehensive and effective means for compliance and enforcement of mitigation measures. 32-38

C. The proposal (at p. 7-4) to have the Bureau of Land Management (BLM), a federal agency, administer the mitigation monitoring program required under California state law is unusual. Can you cite authority for this? Again, we would refer to CEQA's requirement for a reporting or monitoring program "designed to ensure compliance during project implementation," and be concerned whether this standard can be met by a federal agency with necessarily limited exposure to, or understanding of, 32-39

RESPONSE TO LETTER 32:

5.3.1-4(a) *A map for the proposed staging area and turnarounds for the northernmost 25 miles of the pipeline route shall be submitted to the BLM for approval before construction is initiated to ensure that staging areas and turnarounds are within the ROW, the tank farm or existing roadways and cleared areas. BLM will verify that only the working right-of-way, The existing access points and previously cleared areas will be utilized.*

32-33 The discussion of the impact addresses location and times of the required surveys. It is necessary that these surveys be undertaken prior to construction. The permitting process has resulted in changes to the construction schedule.

5.3.1-6(a) *A survey for the western spadefoot toad shall be carried out in suitable areas (Cajon Wash, Lytle Creek, and alluvial scrub habitats south of Lytle Creek) between February and April.*

32-34 No significant side effects of mitigation measures were identified in compilation of the Draft EIS/EIR.

32-35 The proposed pipeline route is located in the vicinity of an elementary school in Adelanto. Since the Draft EIS/EIR has been completed, a junior high school site has also been approved. The Cajon Pipeline Company has reviewed alternative routes to avoid these school site locations. The alternative route is discussed in Section 5.7 of the Final EIS/EIR.

32-36 Comments have been sought from all cities and counties which are located in the vicinity of the project through the public review process. A listing of all federal, state and local governmental entities contacted has been included in Section 8-5.

32-37 Refer to response to Comment 32-26.

32-38 Comment noted.

32-39 The authority of BLM to oversee compliance is addressed in Section 3-2 of Volume II of the Final EIS/EIR.

COMMENT LETTER 32:
CALIFORNIA PUBLIC UTILITIES COMMISSION

California state and local requirements. This concern is compounded by the apparent conflict in the statements at p. 7-4 in which ...

> "Compliance with each mitigation measure shall be monitored by the BLM, and a record kept of the project's compliance or non-compliance;" but
> "The project shall demonstrate compliance with each mitigation measure in a written report submitted to the applicable enforcement agency prior to issuance of a ROW grant, grading permit or operation, and, as applicable, provide periodic reports regarding compliance with such conditions."

32-39

Thank you again for the opportunity to provide you with our comments on the Cajon Pipeline Draft EIR. If you have any questions, please do not hesitate to call Martha Sullivan of my staff at 415/703-2126 (FAX 415/703-1965).

Sincerely,

Paul Clanon

PAUL CLANON, Assistant Director
Commission Advisory and Compliance Division

cc: Martha Sullivan
Geoff Dryvynayde, CPUC Legal Division

RESPONSE TO LETTER 32:

COMMENT LETTER 33: CITY OF POMONA

December 31, 1992

Bureau of Land Management
6221 Box Springs Boulevard
Riverside, CA 92507-3714

Attn: Stephen L. Johnson

Re: COMMENTS ON THE "CAJON PIPELINE" DRAFT ENVIRONMENTAL IMPACT REPORT

Dear Mr. Johnson:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Cajon Pipeline project. After reviewing the document, the City of Pomona offers the following comments:

Page 2-11, Table 2-1, Sec. 5.2

A pipeline rupture in bridge spans MP 99.5 and 100.1 would result in an oil spill being pumped automatically out of the bridge undercrossing and into the storm drain system. Mitigation should include bridges being analyzed for additional weight, bridges being upgraded to conform to latest seismic standards and provision of sufficient bonds to guarantee cleanup of storm drain systems. Another mitigation measure would be to bore under or trench around the undercrossing. 33-1

Page 2-40, Sec. 2.5

Please revise as follows:

The pipeline route bisects the 780-acre Downtown Specific Plan project area. Other projects include the reuse of the Mayfair Hotel building and a commuter rail stop south of the Union Pacific railroad tracks, north of First Street and at the foot of Thomas Street.

A 36-inch storm drain will be constructed across First Street within Park Avenue (approximately MP 100.3). A 21-inch sanitary sewer will be constructed across First Street within Gibbs Street (approximately MP 100.0). A 21-inch sanitary sewer will be constructed across First Street at either 33-2

RESPONSE TO LETTER 33:

33-1 Comment noted. Stream channels at M.P. 99.5 and M.P. 100.1 are tributaries of the Chino Creek. At these locations First Street and the cross streets are grade separated, that is First Street bridges Towne Avenue at M.P. 99.5 and Garey Avenue at M.P. 100.1. At these exposed locations it would be preferable that the pipeline is below ground and trenched beneath the storm channel. Given the existing bridge structure and physical arrangement at these street crossings this may not be feasible. Mitigation measure 5.2.1-5 has been revised to include the concerns of the City of Pomona.

5.2.1-5(e) *At M.P. 99.5 and 100.1 the Cajon Pipeline Company shall coordinate with the City of Pomona methods of reducing the risk of oil spill into the storm channels below these crossings. This may require rerouting so that the pipe can be bored beneath these channels, or inclusion of additional valves at these locations to reduce the linefill at each crossing. Additionally, if pipe is to be hung from the bridge support structure, engineering review shall be conducted to ensure engineering integrity and strength of each bridge.*

33-2 Comment noted. The text on page 3-40 of the Draft EIS/EIR regarding the city of Pomona will be replaced by the suggested wording and additional information provided by the commentor.

COMMENT LETTER 33: CITY OF POMONA

COMMENTS ON THE "CAJON PIPELINE" DEIR
December 31, 1992
Page 2 of 3

Reservoir Street (MP 99.0) or East End Avenue (MP 98.5), in accordance with the City's latest sewer deficiency study.

Page 4.1-5

The DEIR should discuss the Chino Fault , as the proposed pipeline will cross this fault when passing through the City of Pomona. 33-3

Page 4.5, 6 and 7

Although the DEIR states that the pipeline project follows the guidelines provided by the California Department of Health Services (DHS) Office of Noise Control, it does not consider the City of Pomona's adopted Noise Ordinance, which regulates and enforces noise levels generated within the City of Pomona. Attached is a copy of the City of Pomona Noise Ordinance. 33-4

Page 4.7-5, Table 4.7.1-1

Please correct the spelling of "Lanternman" to "Lanterman." 33-5

Page 4.7-12

The zoning and General Plan Land Use designations for the portion of private land which the proposed pipeline will cross are M-1-S (Light Industrial Supplemental) and "General Manufacturing," respectively. Projects which fall within a zone with a "Supplemental Use Overlay District" to the base zoning district will require a Conditional Use Permit if an intensification of land use occurs. The foregoing information should be included under this section. Additionally, under the paragraph heading "City of Pomona," please delete the letter "a" after "within" and before "1,500 feet." 33-6

Page 4.8-5, Table 4.8.1-1

Add: Water - City of Pomona Water Department, Sanitary Sewers - City of Pomona. Public Works Department and Los Angeles County Sanitation Districts. 33-7

Page 4.9-8

Why is 1987 census data used rather than 1990 census data or 1992 Department of Finance estimates for Housing, Population and Employment? 33-8

Page 4.10-1, Sec. 4.10.1

Second paragraph, third sentence: First Street ends 1300 feet before Mt. Vernon begins. The pipeline will have to run within railroad right-of-way for that distance, which is on private property. 33-9

RESPONSE TO LETTER 33:

33-3 Discussion of Chino Fault will be added to the Final EIS/EIR in Chapter 4.1.

33-4 Mitigation measure 5.5.1-1 recommends timing for construction so as to avoid noise impacts. Compliance with local ordinances is specified within this mitigation.

33-5 Comment noted. This spelling error has been corrected.

33-6 The information provided on land use and zoning designations is appreciated, however, the purpose of the EIS/EIR section referenced is to describe existing land use, rather than general plan and zoning information. The letter "a" will be removed as indicated.

33-7 Comment noted. Table 4.8.1-1 has been revised as requested.

33-8 This section of the document was compiled initially in November, 1991 at which time this information was not available.

33-9 Comment noted. Section 4.10.1 has been revised per this comment.

COMMENT LETTER 33: CITY OF POMONA

COMMENTS ON THE "CAJON PIPELINE" DEIR
December 31, 1992
Page 3 of 3

Page 4.10-4, Table 4.10.1.1

The following seven crossings are not shown: (1) East End Avenue, MP 98.5 (2) Reservoir Street, MP 99.0 (3) San Antonio Avenue, MP 99.3 (4) Palomares Street, MP 99.3 (5) Main Street, MP 100.2 (6) Park Avenue, MP 100.3 (7) Hamilton Boulevard, MP 100.8. 33-10

Page 5.5-4, Sec. 5.5.1-2

As was mentioned previously, the City of Pomona has adopted a Noise and Vibration Control Ordinance. In certain cases such as the Lanterman State Hospital noise receptor, the estimated noise level during construction violates the City of Pomona Noise Ordinance. Please add mitigation measures for all locations of sensitive noise receptors. Examples could include restricting days and/or hours of construction. 33-11

Page 5.1-6, Sec. 5.1.1-6

Same as comments on Page 2-13. 33-12

Page 5.10.3

Add: From MP 104.2 to MP 104.6, the route would be located in Valley Boulevard, a divided major arterial of four lanes with ADT of 23,000, which is the access to the Spadra Landfill. Significant adverse impacts will occur during construction, which must be mitigated. 33-13

If you have any questions regarding the above comments, please contact me at (909) 620-2191.

Sincerely,

Dennis R. Mackay

Dennis R. Mackay, AICP
City Planner

RM/dw

cc: M. Margo Wheeler, Community Development Director
Robert DeLoach, Public Works Director

pipe

RESPONSE TO LETTER 33:

33-10 Comment noted. Table 4.10.1-1 has been revised per this comment.

33-11 Refer to response to Comment 33-4.

33-12 Refer to response to Comment 33-1.

33-13 Comment noted. The text on page 5.10-3 has been revised as requested.

COMMENT LETTER 34:
THE CALIFORNIA NATIVE PLANT SOCIETY

THE CALIFORNIA NATIVE PLANT SOCIETY

January 2, 1993

Bureau of Land Management
Attn: Stephen L. Johnson
6221 Box Springs Blvd.
Riverside, CA 92507-0714

Re: Cajon Pipeline Project DEIS/EIR.

Dear Mr. Johnson,

Whereas BLM now identifies plant communities as unique renewable resources, BLM has not sufficiently incorporated plant community management into its overall planning process. The Cajon Pipeline Project DEIR/EIS "Standards of Significance" section in Biological Resources (5.3-1) illustrates that clear policy regarding the protection of plant communities is lacking. 34-1

While acknowledging that "Loss of a native wildlife habitat or a plant community that is considered to be regionally unique or rapidly declining" is a significant impact, what methodology will BLM use to determine if a plant community is rapidly declining? The California Native Plant Society has determined that each of the following plant communities is ranked as very threatened (S1. 1) in California:

Mojave riparian forest,
Sonoran cottonwood willow riparian forest,
mesquite bosque, and
sycamore alluvial woodland.

Of the total acreage of these plant communities found in the CDCA, what percentage of this acreage will be disturbed for each threatened community? In what condition are these native plant communities? Have they been invaded by tamarisk? Will disturbance in the washes allow the introduction of non-native species such as tamarisk? Does invasion by tamarisk or other native plant species constitute a loss? 34-2

Throughout our state, native grasslands are one of the most threatened and rare plant communities, so another important plant community of great concern to CNPS is the desert grassland. These include all native grass types in hot deserts of southern California, such as *Stipa speciosa*, *Hilaria rigida*, and *Aristida* spp. All locations of desert grassland along the proposed pipeline routes should be identified and mapped and treated as a sensitive community. 34-3

DEDICATED TO THE PRESERVATION OF CALIFORNIA NATIVE FLORA

RESPONSE TO LETTER 34:

34-1 Where appropriate and possible, potential significance of impacts on plant communities per se was discussed in the Draft EIS/EIR, notwithstanding the lack of written BLM standard in some cases. A specific example of this identification of potential impacts and mitigation is with respect to the microphytic crust community.

34-2 Riparian and alluvial plant communities are discussed as sensitive habitats in Section 4.3 of the Draft EIS/EIR. The pipeline ROW and not the pipeline itself would only intersect Riparian Scrub in the Cajon Wash. These areas will not be disturbed as only portions of the ROW would be utilized for construction purposes in crossing the Cajon Wash. Disturbance in washes is not likely to cause colonization of regions not now inhabited by tamarisk, but might facilitate its spread where it is already present. Measures to be taken to minimize growth of non-native species in disturbed and/or revegetated areas will be described in the Revegetation Plan as part of the Erosion and Sedimentation Control element of the COM Plan.

34-3 Native grasslands are an important plant community, however, no native grasslands were identified along the ROW.

COMMENT LETTER 34:
THE CALIFORNIA NATIVE PLANT SOCIETY

January 2, 1993
Re: Cajon Pipeline Project DEIS/EIR

Page 2

Furthermore, it is evident that disturbed soil creates suitable conditions for the invasion of non-native plants which then alter the plant community composition, if not, in some cases, completely displace a plant community. Yet I see no mitigation for the weeds which will certainly gain access to new areas of the desert. Without a long-term provision for weed eradication, CNPS disagrees that the proposed revegetation program would reduce impacts to a less-than-significant level. Can the Bureau provide examples from past projects where revegetation has reduced impacts to a less-than-significant level? 34-4

For the standard "Substantially diminished or reduced habitat for fish, wildlife, or plants" to be applicable would require that BLM have an inventory of, in the case of plants, plant communities. What are the acreage of all plant communities within the CDCA and what percentage of each will be removed and disturbed? This standard should recognize the condition of the plant communities as well, and it this project results in native plant communities being degraded or replaced by non-native plants, "substantially diminished" should include a reduction in native plant cover (even if overall cover does not decrease). Furthermore, does this project's cumulative impact, when added to all the other projects which are scheduled to disturb or have disturbed native plant communities, "substantially diminish" habitat for plants? How is this project's long-term impact on plant community fragmentation mitigated to no significant impact? 34-5

Lastly, the standard "Disturbance of wetlands, marshes, riparian woodlands and other wildlife habitat" is the most confusing of all. If the intent is to define any disturbance as a significant biological impact, the standard would be clearer if it stated "disturbance to wildlife habitat." However, since it first describes riparian habitats, it is unclear what "other wildlife habitat" means. In any case, does disturbance include the introduction of non-native species caused by soil disturbance? If so, how can the mitigation claim to reduce disturbance to a less-than-significant level when weed invasion will be allowed? 34-6

Tamarisk riparian woodlands, non-native grasslands, and Russian thistle fields are non-native plant communities which have displaced native plant communities in the CDCA. The proliferation of exotic annual plant species such as *Bromus*, *Schismus*, and *Salsola* has increased the fuel load and frequency of fires in parts Mojave Deserts in recent years, and particularly in the Western Mojave, has lead to type conversion whereby native perennial scrub is transformed into exotic weedlands with a high fuel load. We believe that BLM needs to prevent the introduction of non-native plants, and act according to the Desert Plan (page 41) which calls for management which will "...maintain the continued existence and biological viability of the vegetation resource in the CDCA..." and promote "a balanced use of resources, favoring diversified plant and animal communities, [which] would be desirable over monocultures (pure stands) or the total replacement of native communities." 34-7

RESPONSE TO LETTER 34:

34-4 There are no long-term examples where revegetation prevented weed invasion. Revegetation within the desert is a developing science, but this focuses on re-establishing native plants within areas of disturbance. BLM personnel are actively pursuing all new developments in this area, but post construction monitoring of past linear ROW projects on federal lands has not shown any significant invasion of non-native species. However, methods to minimize growth of non-native species will be included in the Revegetation Plan as part of the Erosion and Sedimentation Control element of the COM Plan.

34-5 Compared to the acreage of the region the pipeline would pass through, the ROW is a very small area. Only in the case of communities that are already scarce, for example, riparian or desert grassland, would the reduction referred to be "substantial". The ROW would not fragment any existing communities. The revegetation plan would require that disturbed areas are restored as communities similar to those that surround it.

34-6 The Revegetation Plan within the Erosion and Sedimentation Control element of the COM Plan will specify the prescriptions that will be employed to implement the mitigation measures that were designed to minimize the invasion of non-native species. However, introduction of non-native species does not result from soil disturbance, unless unclean fill is imported from other locations. Fill will not be imported for pipeline construction. The revegetation plan will specify how to minimize colonization of disturbed soil by non-native species that are already present.

34-7 See response to Comment 34-6.

COMMENT LETTER 34:
THE CALIFORNIA NATIVE PLANT SOCIETY

January 2, 1993
Re: Cajon Pipeline Project DEIS/EIR

Page 3

The other area I would like to address is the inability by the public to comment on specific mitigation measures for revegetation. The fragmentation of plant communities and the introduction of non-native plants is one of this project's most significant impacts. The public needs to know the revegetation goal and management prescriptions. 34-8

The revegetation methods proposed in Mitigation Measure 5.2.1-a(o)(v): "...discing and drilling on the contour (with broadcast seeding of a native species mix), fertilizing, water barring, tree spading of mature species along the ROW into the disturbed areas..." are not appropriate for the desert. BLM has already noted in their response to my letter regarding the Baltic Mine Project that fertilizing is not appropriate in the desert. I know of no desert revegetation project that has had meaningful success when broadcast seeding was the planting method. What is envisioned by "tree spading of mature species?" 34-9

Regarding Mitigation Measure 5.3.1-3(b), what is the specific goal of the revegetation mitigation in terms of percent of native vegetative cover in how many years? What is the budget for the revegetation project overall, per year, and per acre. Will irrigation be used? Will weed eradication be performed? If so, what species will be targeted? How will BLM ensure that monitoring of the revegetation project will occur? How much of a bond will the proponent put up to ensure completion of revegetation project? Will revegetation take place in common plant communities? Of the 630 acres of common native plant communities being removed, what percentage will be revegetated? Please list the sensitive plant communities that will be avoided during construction and identify these on a map (5.3.1-3(e)). 34-10

Will staging areas (as excluded specifically in 5.3.1-3) be revegetated? How many acres of staging areas within native plant communities are proposed? Since staging areas will disturb soil, these areas should be revegetated also and mitigated for weed invasion. How will areas disturbed by this project in excess of 630 acres be revegetated? What provisions will be made for error (such as the one made when a segment of the All American corridor was inadvertently driven into the Amboy Wilderness Study Area)? 34-11

In conclusion, while always concerned with sensitive plant species and communities, CNPS's overriding concern is that this pipeline project does not degrade the overall condition of plant communities in the desert, regardless of which particular communities are impacted. Since it has been shown that revegetation methods which can return a disturbed area to natural looking in 10 years are possible, why shouldn't the project proponent be required to restore the land to a similar condition to what it was before the project occurred as soon as possible? 34-12

RESPONSE TO LETTER 34:

34-8 See response to Comment 6-4.

34-9 This mitigation measure applies to revegetation between M.P. 0 and M.P. 80 of the pipeline route, which not only contains desert habitat. No fertilizing will be utilized in the desert areas and various planting methods specific to each species shall be utilized. Tree spading is discussed in response to Comment 6-6.

34-10 The revegetation plan will not be uniform over the ROW, but would be tailored to surrounding communities to ensure a uniform (non-fragmented) and naturalistic as possible post-project landscape. The plan would address the types of communities to be re-created, with field adjustments of each proposed planting stock by a revegetation specialist. The goal of the revegetation plan would be a target cover by native species after 6 years of at least 70 percent of existing pre-construction coverage with no areas dominated by non-natives. The pre-construction coverage in itself varies dependent upon plant community. The relative cover of non-natives would be specifically addressed in monitoring specifications and if relative cover of non-natives exceeds pre-construction conditions, a decreasing trend in occurrence must appear or remediation steps specified within the plan must be undertaken. Monitoring and bonds for plan implementation would be discussed in the revegetation plan.

34-11 Staging areas are presently proposed to be located within the 12-Gauge Tank farm or within the ROW. After construction, these areas will be revegetated if not within the planned tank farm area. Monitoring during construction by the BLM will ensure that no additional acreage is disrupted.

34-12 The revegetation plan will specify that the disturbed vegetated areas must be returned to pre-construction conditions. Refer to responses to Comments 34-9 and 34-10.

COMMENT LETTER 34:
THE CALIFORNIA NATIVE PLANT SOCIETY

January 2, 1993
Re: Cajon Pipeline Project DEIS/EIR

Page 4

The mitigation being offered in this DEIS/EIR does not offer a clear revegetation goal. Previous pipeline projects have left plant communities fragmented and scarred, and with the invasion by non-native plants, it is unlikely that they will return to their native condition before hundreds of years have passed. Furthermore, if BLM has adopted a policy whereby disturbances to native plant communities will not be mitigated, then BLM must place a limit on cumulative disturbances and begin adding up all the individual projects whose impact on native communities will last hundreds of years. 34-13

As member of the Desert District Advisory Council, I requested information regarding previous mitigation and monitoring results when we were briefed by you on this project in June 1992. I have not been presented with any information to this date, and this was noted at our December Advisory Council meeting. My reason for requesting this information is simple: unless a proponent can demonstrate that proposed mitigation measures have proven successful, I believe that BLM should only accept proven or new methods for revegetation projects. As far as CNPS is concerned, the revegetation element of this project is the most important one, thus it is imperative that BLM require a known method with a past history of success. 34-14

Thank you for the opportunity to comment.

Sincerely,

Steven Hartman

Steven Hartman
California Native Plant Society
4444 Longridge Avenue
Sherman Oaks, CA 91423

RESPONSE TO LETTER 34:

34-13 Refer to response to 34-10.

34-14 Because revegetation methods for plant communities, including desert habitats, are continually improving, it is preferable to specify goals (as stated in response to Comment 34-10) rather than methods, and then to use proven methods to achieve these goals.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

RESPONSE TO LETTER 35:

PACIFIC PIPELINE SYSTEM, INC.

1727 Mesa Verde Avenue, Suite 201 • Ventura, CA 93003 • (805) 658-0742
12201 East Arapahoe Road, Suite C-90 • Englewood, CO 80112 • (303) 792-2535

January 4, 1993

Mr. Stephen Johnson
U.S. Department of Interior
Bureau of Land Management
6221 Box Spring Blvd.
Riverside, CA 92507

Ms. Pat Chamberlaine
City Manager
City of Adelanto
Adelanto, CA 92301

RE: Cajon Pipeline Draft EIS/R

Dear Mr. Johnson and Ms. Chamberlaine:

As noted in the Cajon Pipeline Draft EIS/R ("DEIS/R"), several alternative projects for transporting crude oil produced in the on- and off-shore areas along the Santa Barbara and Ventura coast are currently under consideration by various lead agencies. In order to ensure a meaningful and legally adequate evaluation of these transportation alternatives, it is critical that the environmental documentation prepared for these projects include complete and accurate project descriptions, complete and accurate assessments of environmental impacts, and a meaningful evaluation of project mitigations and alternatives.

As the sponsor of one of these pipeline projects, Pacific Pipeline Systems, Inc. ("Pacific") is concerned about the missing and inaccurate data, missing and inaccurate analysis, and other legal deficiencies in the Cajon Pipeline DEIS/R. Some of these deficiencies relate directly to Pacific's project, but most concern the Cajon project itself. This letter includes detailed comments on the Cajon Pipeline DEIS/R. Critical legal deficiencies are summarized below:

- Inaccurate and Incomplete Project Description and Schedule. There are several problems with the project description which render the environmental evaluation flawed and incomplete. Major problem areas in the project description are noted below.
  - The first major omission in the project description is the fact that system design information is preliminary at best, and fails to include major design features (eg., final length of pipeline, spill communication measures) which are critical to the environmental assessment.
  - A second principal omission in the project description is the failure to present any details regarding the increased flow through the AAPL System of 180,000 BPD: this element missing from the project description invalidates every impact assessment which is dependent on flow rates or systems components, including the impact areas of air quality and energy consumption, as well as spill-related impact issues such as biological resources, water quality, etc.
  - A third major omission in the project description is the fact that the pipeline will parallel mainline power transmission lines for 25 miles in an established utility corridor south of Kramer Junction. Inductive currents caused by these transmission lines adversely affect the

COMMENT LETTER 35: PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

cathodic protection system in pipelines, and it is therefore prudent to locate pipelines away from parallel mainline power transmission lines. The Cajon DEIS/R does not identify any engineering work to assess or mitigate against this significant risk to the cathodic protection system, and failure of this system will result in undetected leaks and increased risks of leaks.

- The fourth major problem in the project description is the fact that the proposed schedule is technically and legally infeasible. How can all ROW be acquired from private landowners only one month after the project receives the necessary permits? How can final design begin after the pipes are purchased? How can construction begin at the same time final design work begins? How can purchase and delivery of station equipment begin before the final design work is completed? How can construction begin six months before project permits are issued? To take just one issue as an example, pipe is not sitting on a shelf: at least three months is needed after the pipe is ordered to manufacture the pipe and then coat, insulate and jacket the pipe. This type of pipe order requires an irreversible investment in excess of $25 million, and the project schedule presented in the DEIS/R requires this investment to be made before the project is permitted and before the necessary ROW is acquired from private parties. The project schedule is so inaccurate and misleading that it also invalidates the construction-related seasonal impacts assessment in biological impact analysis and other impact areas.

- Fifth, the DEIS/R fails to identify all discretionary approvals the project will be required to obtain. Specific missing discretionary approvals are noted in the comments, but this omission means that responsible agencies were not notified or consulted during the EIR preparation process, that inconsistent analytical methodologies or mitigation requirements may have been included in the DEIS/R, and that responsible agencies which were not notified on a timely basis are not bound to the City's CEQA determination and can in fact require the project to undergo a comprehensive, de novo CEQA review.

- Finally, the scheduled completion of the DEIS/R process in the first months of 1993 is likewise unrealistic. As noted below, providing for adequate public review of the technical appendices requires a minimum five week extension beyond January 5, 1993. Likewise, correcting the data and analytical deficiencies in the evaluation of impacts and alternatives will require the addition of significant new information and recirculation of a revised DEIS/R. Recirculation will add three or more months to the EIR/S schedule. When combined with the need to extend the public review period for the technical appendices, it is unrealistic to plan for completion of the NEPA/CEQA process before late summer 1993.

- Inaccurate and Missing Environmental Analysis. The majority of Pacific's comments on the DEIS/R concern inaccurate and missing environmental analysis, including failure to identify or mitigate significant adverse impacts. While these problems are too numerous to summarize briefly, most fall into the following major categories:

  - There are several significant impacts which simply are not addressed in the DEIS/R. One important example is the absence of any data regarding land contaminated by leaks or spills of hazardous materials located in or adjacent to the ROW. Such contamination problems may be significantly exacerbated by improper construction techniques, illegal handling or disposal of contaminated dredged materials, and cause worker- and public health hazards from exposure to contaminated soils. Construction activities on known contaminated areas can cause significant adverse impacts and unlawfully interfere with cleanup activities under the supervision of federal, state and local agencies. The history of linear construction

RESPONSE TO LETTER 35:

COMMENT LETTER 35: PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

projects in the vicinity of the Cajon project confirms that previously-undiscovered contamination is likely to be found during construction activities, and a specific contingency plan is needed to handle these circumstances. Similarly, several significant impact areas identified as issues of concern to the public or other agencies during the Cajon scoping process are not addressed in any way in the DEIS/R. Other impact areas have missed important data (and thus omitted required evaluation) such as failure to identify stream or road crossings, or proximity to seismic faults.

- Another major problem throughout the DEIS/R is the absence of sufficient or adequate specificity in the impacts assessment, mitigation strategies, and alternatives analysis. For CEQA purposes, "courts have favored specificity and use of detail in EIRs since "a conclusory statement 'unsupported by empirical or experimental data, scientific authorities, or explanatory information of any kind' not only fails to crystallize issues but 'affords no basis for a comparison of the problems involved with the proposed project and the difficulties involved in the alternatives.'" (Whitman v. Board of Supervisors, 88 Cal.App.3d 397, 411 (1979).) The Cajon DEIS/R fails to meet these standards: it is not specific or detailed enough to meet what has consistently been considered a reasonable level of detail and specificity for this type of project. This problem is particularly apparent given the number of recent pipeline EIRs which have been approved or are now in preparation in the Southern California area. Specific comments noted below detail the numerous shortcomings in the analysis of impacts and mitigation measures.

- Likewise, the alternatives analysis provides the lead agencies with an inadequate basis for an environmental comparison of alternatives. This problem is particularly acute in the important impact areas of biological and cultural resources. In fact, information presented about Pacific's project (some of which is itself inaccurate or outdated, as noted below in this letter) includes more quantitative information and is more complete than what is presented for the Cajon project itself. The analysis of alternate routes for the Cajon project is wholly inadequate and appears to have been prepared without benefit of any fieldwork. This is particularly problematic since NEPA requires that the preferred project and alternative projects be studied to the same level of detail.

- Another major problem with the Cajon DEIS/R is its reliance on less stringent significance criteria for the Cajon Pipeline as compared to the significance criteria used to assess the impacts of the Mobil-70 Pipeline and the Pacific Pipeline. Use of outdated air quality significance criteria which are less stringent than current legal requirements, for example, allows the Cajon DEIS/R to understate the magnitude of air quality-related impacts. This problem causes the impacts assessment of the Cajon pipeline to be flawed, and it also results in an inaccurate and unfair comparison to other pipeline projects which are required to comply with the correct, more stringent significance standards.

- Flawed Public Review Process Requires Extension of Comment Period. Pacific's representatives tried unsuccessfully on numerous occasions to obtain the technical appendices for the Cajon DEIS/R. These documents were not available for public review until December 28, one week prior to the close of the 60-day public comment period. The technical appendices are an integral component of the DEIS/R, and in fact data deficiencies in the DEIS/R make it impossible to understand some of the technical issue areas (eg., air quality, cultural resources) without having access to the technical appendices. The unavailability of the technical appendices during the public comment period is a significant procedural flaw which can be corrected only by extending the public review period for an additional five weeks beyond January 5, 1993. This time is needed for Pacific

RESPONSE TO LETTER 35:

COMMENT LETTER 35: PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

and other concerned parties to review the technical appendices, integrate this review with the review of the DEIS/R itself, and submit meaningful comments on the technical appendices. Pacific's very preliminary review of these documents confirms that the project description data used in the technical appendices are inconsistent with the project description data presented in the DEIS/R (see, e.g., air quality) and that the technical appendices themselves are incomplete or outdated (see, e.g., cultural resources and biological evaluation). Pacific will be submitting detailed comments on these flawed documents as soon as possible and requests specific assurance that these comments will be accepted after January 5, 1993.

- Recirculation of Revised DEIS/R Required. Correcting the numerous informational, analytical and procedural deficiencies in the Cajon DEIS/R will require the addition of "significant new information" to the environmental documentation. This "significant new information" must include a final and complete project description, the completion of missing studies and fieldwork, quantitative evaluations in all impact sections, corrected assessments of the significance of project and cumulative impacts, and an assessment and evaluation of alternatives based on accurate and complete information (including field evaluations of alternate routes for the Cajon project).

Comments on the specific deficiencies of the Cajon DEIS/R follow. For the convenience of the reader, each comment includes a specific page and paragraph number reference to the Cajon DEIS/R, and comments on related issue areas (eg., Geology setting and Geology impacts and mitigations) are presented together.

PROJECT DESCRIPTION AND GENERAL COMMENTS

Chapter 1.0 Introduction

Section 1.2 Purpose and Need for the Project
Page 1-3, Paragraph 1

The existing pipeline capacity for transportation of San Joaquin Valley crude oil and the ability to add heaters to these pipelines for movement of heavy crudes is not addressed. Since there is no clear description of the transportation options, it is difficult to determine the actual usefulness of this project and the description of project objectives is incomplete. 35-1

Page 1-3, Paragraph 3

The discussion fails to account for recent developments in the tankering situation in Santa Barbara County and by the California Coastal Commission. These developments indicate that unconditional throughput and deficiency agreements with a pipeline developer may not be required for tankering of Santa Barbara Channel crude oil from Gaviota to Los Angeles on an interim basis. Specifically, the signing of unconditional agreements may not be required until some time in 1994, and tankering may be allowed for some specified period of time after that point. The Coastal Commission de novo hearing on the tankering permit will be held in January 1993. 35-2

Page 1-3, Paragraph 3 and Table 1-1

The statement that "pipeline transport is generally considered to be the most satisfactory transportation mode because it poses the least threat to public safety and the environment" is not supported by Table 1-1 to which the statement refers. Table 1-1 indicates that pipelines spill 6.6 to 50 times as much 35-3

4

RESPONSE TO LETTER 35:

The following are detailed responses to specific comments on the Cajon Pipeline Draft EIS/EIR which commences on page 4 of the Pacific Pipeline System Inc. comment letter. The first 3 pages of this comment letter are summarized points which are explained in further detail in the remainder of the letter.

The commentor addresses on a number of occasion the level of detail pertaining to environmental setting information. In preparing the EIS/EIR, a lot of these issues were examined in more detail to assess and determine the existence and level of significance of environmental impacts. However due to the need for clarity and conciseness the information was summarized. The CEQA Guidelines require that the EIR should be "analytic rather than encyclopedic", (Guidelines, Section 15006). Consideration should also be given to document length. Section 15141 recommends that for a proposal of unusual scope or complexity, text should normally be less than 300 pages.

The EIS/EIR preparers recognize that this project is of unusual scope and complexity. In summarizing the technical information, the level of detail provided is that necessary to understand the significant effects of the proposed project. Additional information has been provided or revised in the section as requested by the commentor if it is found to aid the determination of the level of impact and if it further defines mitigation measures.

35-1 The relationship of the proposed project to upstream facilities is addressed in response to Comment 44-5. Please refer to response to Comment 44-5.

35-2 The developments in marine tankering and the meetings of the California Coastal Commission occurred after the Draft EIS/EIR for the proposed project was released. Information pertaining to marine tankering has been updated in Section 3.4.5 of the Final EIS/EIR.

35-3 Table 1-1 demonstrates that the frequency of a spill occurring for the alternatives modes. The frequency of spills occurring for pipelines is far lower than any of the other alternatives. The volume spilled is high for pipelines compared to other alternatives because the distances travelled for each other mode is greater; therefore, volume per mile is much smaller than for a pipeline. It is the frequency of spills which is of interest.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

oil per volume transported as any of the other three transportation modes considered. To provide an accurate comparison, this statistic should be presented in terms of an impact-related assessment.

In addition, the entries in Table 1-1 are probably incorrect. The values in Table 1-1 indicate that the average spill for pipelines is over 2 million gallons per billion ton-miles transported, while for marine tankers the average spill per billion ton-miles is only about 2,100 gallons. It is possible that the records of spills per billion ton-miles are actually spills greater than some threshold volume, with the threshold being different for each mode of transport, and the numbers in the "number of spills" column may not be correlated with those in the volume spilled column. Further, the second source quoted (National Transportation Safety Board, 1971) is too old to provide meaningful comparative data. Regulations, practices, and equipment have changed so significantly in the last 10 to 20 years that spill data over 20 years old should not be compared to much newer statistics. 35-3

Section 1.3 Relationships to Policies, Plans and Programs
Page 1-4, Paragraph 1

The DEIS/R indicates that the alignment would be within existing utility corridors. Would the Cajon Pipeline parallel any existing high voltage power lines? If so, how would cathodic protection effects from the induced current caused by these transmission lines be mitigated? Pacific has learned that in fact the Cajon Pipeline would parallel existing high transmission lines for approximately 25 miles south of Kramer Junction, and would parallel proposed new high transmission lines for the Adelanto-Lugo transmission line connecting the Adelanto switching station to the Lugo substation. How will this existing and proposed project affect the Cajon Project's cathodic protection system? Why was this significant impact omitted from the DEIS/R? 35-4

Section 1.5 Content of the EIS/EIR
Page 1-6, Paragraph 3, Third Bullet Item

The discussion states incorrectly that the Pacific Pipeline is from Goleta to the Los Angeles Basin. The origination station is at Gaviota. 35-5

Page 1-7, Table 1-2

The table fails to identify all responsible agencies and all necessary discretionary approvals. These omissions are significant, since there is no assurance that the agencies (or permit requirements) omitted from the list will receive adequate information about the project and the NEPA/CEQA review process, that the project will in fact be able to satisfy their permit requirements, or that the project complies with their applicable planning and policy requirements.

For example, the Table fails to identify the United States Forest Service as requiring a permit or grant of right-of-way. 35-6

The table also fails to indicate that for the BLM, right-of-way are granted under the Federal Land Policy and Management Act of 1976. It also fails to note that the BLM also issues a Notice to Proceed and prepares a Construction, Operation, and Management (COM) Plan that is site-specific.

The table does not indicate, with respect to the Corps of Engineers, whether a Section 404 permit, Section 10 permit, or a nation-wide agreement will be necessary.

5

RESPONSE TO LETTER 35:

35-4 There is nothing unique in locating a pipeline adjacent to a high voltage transmission line. This has been done for over 25 years in areas such as Houston, Chicago and Dallas. The trend of government agencies is to deny access for new rights-of-way if they are proposed outside of existing designated corridors. This results in situations where power lines, pipelines, communications lines and similar services must co-exist in a relatively narrow utility corridor. This minimizes the amount of land used by several different utilities and studies have shown that co-location, especially of pipelines next to electric transmission lines, do not result in significant impacts, one to the other.

The Cajon pipeline will parallel existing power lines from M.P. 14.6 to M.P.40.1 (distance from the C/L of the towers to C/L of the pipeline varies from 300' to 1000').

The Cathodic Protection System will be designed to take into account the spatial density of energy surrounding power line conductors. This density decreases sharply with an increase in distance from the conductors. Also power faults that could occur at a power line structure will be considered in the cathodic design.

Additionally, the use of mitigation wires will be studied in the cathodic protection design. With a properly designed Cathodic Protection System, there will be no adverse effect from the power lines. Current, "State-of-the-Art" systems along with test stations and computer models - such as the ECCAPP program are designed for just such a situation.

35-5 This correction has been made in the Final EIS/EIR.

COMMENT LETTER 35: PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

The table fails to list the California Department of Fish and Game for California Endangered Species compliance, or the U.S. Fish and Wildlife Service for Federal Endangered Species Act compliance. 35-6

The table does not identify state and federal regulations regarding cultural resources, including the National Historic Preservation Act.

Chapter 2.0 Synopsis of Project and Alternatives

Section 2.2 Environmental Impacts and Mitigation Measures for the Proposed Project
General Comments on Section 2.2

Tables 2-1 and 2-2 have numerous errors, inconsistencies, and incomplete analyses. These deficiencies will be discussed in detail in the comments below on Sections 4 and 5 of the DEIS/R. Examples of the deficiencies are as follows: 35-7

-- Page 2-3, Table 2-1, Geology Item 5.1.1-1: Geology Mitigation Measure 5.5.1-1(c) contains an incomplete list of faults. Examples of faults not included in Table 3-1 but which are identified on Table 4.1.1-1 Summary of Active Faults, are: Chino, Whittier, and Newport-Inglewood faults. 35-8

-- Page 2-4, Table 2-1, Geology Item 5.1.1-2: The mitigation to avoid steep slopes does not refer to the Kramer Hills area which has slopes greater than 14 percent grade (See Page 4.1-4, Paragraph 2). 35-9

-- Page 2-6, Table 2-1, Geology Item 5.1.1-5: It is inadequate for the DEIS/R to say that it will eventually address these potential significant impacts prior to construction: the DEIS/R must itself address them. In this example, the DEIS/R does not describe the presence of contaminated soils and potential impacts. The consultation of the "Cortese List" for potentially contaminated sites is now a CEQA requirement, but consideration of contamination-related impacts has always been a necessary component of CEQA review. (See, e.g., McQueen v. Board of Directors of the Midpeninsula Regional Open Space District (6th Dist. 1988) 202 Cal.App.3d 1136.) 35-10

-- Page 2-6, Table 2-1, Geology Item 5.1.1-6: The DEIS/R fails to include mitigation measures for the remediation of contaminated groundwater or protection of sensitive spreading basins threatened by a pipeline leak or rupture. 35-11

-- Page 2-56, Table 2-2, Cultural Resources: The DEIS/R fails to discuss the actual impacts of the Cajon Pipeline. Without information from cultural resources investigations for the Sycamore South Segment Alternative, there is insufficient information for purposes of evaluating the Sycamore South Segment Alternative and comparing it to the other alternatives. 35-12

-- Page 2-56, Table 2-2, System Safety and Reliability: The No Project Alternative refers to Table 1-1, and notes that "marine tankers are subject to spills approximately 20 times as frequently as pipelines." What is the basis for this conclusion? Moreover, Table 1-1 also shows that pipelines spill 50 times as much oil per volume transported as do marine tankers. As stated above, Table 1-1 is either incorrect or it attempts to compare/contrast dissimilar parameters. In any event, the entry in Table 2-2 is misleading without reference to the complete comparison. 35-13

RESPONSE TO LETTER 35:

35-6 The BLM Right-of-Way Grant will be issued under the authority of the Mineral Leasing Act of 1920, as amended (30 USC § 185) which applies to oil and gas pipelines. The Federal Land Policy and Management Act of 1976 (P.L. 94-579) specifically excludes oil and gas pipelines. Under the Mineral Leasing Act, when there are two or more federal land managing agencies involved, the BLM takes the lead (43 CFR § 2882.2-2(b)). The BLM will request the review and concurrence of the U.S Forest Service in review of the Grant of right-of-way, but the USFS will not be approving the project and the BLM Grant will include all federal lands. The inclusion of Notices to Proceed are discretionary and a provision that can be included in the Grant (43 CFR § 2882.3(m)), but it is the Mineral Leasing Act itself that constitutes the discretionary approval. Although the Notice to Proceed is usually tied to the C-O-M Plan as a stipulation of the Permit, the BLM does not prepare that Plan. The preparation of the Plan is the Grant holders responsibility. The BLM then provides review of this site specific document to assure that the stipulations of the Grant will be complied with.

Section 404 Nationwide Permit No. 12 is a type of general permit issued by the Corps of Engineers and is designated to regulate with little, if any, delay or paperwork, certain activities having minimal impacts. Activities are authorized under a Nationwide permit only if that activity and the permittee satisfy all of the Nationwide permit terms and conditions. All nationwide permits need to get a State 401 water quality certification or waiver. Notification of the Corps is not technically required. However, coordination with the Corps shall be undertaken as part of final design of the project. At this time, details and conditions of the Nationwide permit shall be confirmed. As the channels which will be trenched are not navigable waterways, a Section 10 permit is not required. Though not technically required, the Nationwide permit has been added to the tabulated list of required permits and approvals.

As discussed on page 4.3-1 of the Draft EIS/EIR, formal consultation under Section 7 of the Endangered Species Act of 1973 as amended is being undertaken through the Bureau of Land Management with the U.S. Fish and Wildlife Service. Consultation is also underway with the California Department of Fish and Game in accordance with the California Endangered Species Act 2081 permitting regulations. Through an oversight, these permits and approvals were not included in Table 1-2. This has been corrected in Table 1-2.

COMMENT LETTER 35: PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

Chapter 3.0 Alternatives Including the Proposed Action

Section 3.2 Proposed Project (BLM Preferred Alternative)
Page 3-1, Paragraph 2, Project Components

What are the pipe specifications? (E.g., yield, schedule, welded or seamless, type of weld seam.) 35-14

Page 3-1, Paragraph 2, Project Components, Line 3

The Cajon Pipeline includes construction of a massive amount of crude oil storage (750,000 BBL) at 12-Gauge Station. Will the storage be insulated? If the AAPL is to heat the oil (and therefore Cajon Pipeline does not have the burden of constructing emission generating heating stations), and the oil then goes into storage, how is the temperature to be preserved? If oil stays in the tanks (even insulated) for three or four days (storage divided by throughput) the temperature will be lost and the resulting viscosity would prevent or greatly restrict pumping. The DEIS/R later states (at Page 3-13) that the tankage would be largely bypassed on deliveries from AAPL. What is the reason for a tank farm of this size? What is going to be stored in the tanks? These issues again illustrate the project description deficiencies, and the resulting deficiencies in the impacts analysis, relating to omission of the modifications and operational parameters needed on the AAPL components of the Cajon pipeline. 35-15

Figures 3-1 (A) and 3-1 (B)

The combination of routes improperly mapped, mapped differently on different figures, not mapped at all, or not legibly mapped, makes it impossible to clearly identify the alternative routes in question, rendering the maps and figures unusable for decision-making purposes. Following are deficiencies with respect to the maps and figures.

Two major alternate routes are shown on maps from the Cajon terminal to Cajon Pass. The maps in Appendix A only show one alternative for this route segment. The route shown in Appendix A on Maps 1 thru 3 show the alternate starting at the Cajon terminal and rejoining the proposed route at M.P. 25.5 just south of the Kramer Hills. The remainder of the Alternate routes shown on Figure 3-1 A & B are not shown on the Appendix A maps. Routing Alternative # 1 described on Page 3-21 of the DEIS/R is not shown on the Appendix A maps. The Kramer Hills Segment Alternate route is not show on the maps in Figure 3-1 (A) or designated clearly in Appendix A. The Sycamore Canyon Segment Alternate route is also not show on the maps in Figure 3-1 (B). The Sycamore Canyon Segment Alternate is not shown on Maps 11 and 12 in Appendix A either. Figure 3-1 (B) does not show Routing Variation # 1 at Crowder Creek although this variation is shown on Map 10 in Appendix A. 35-16

Figure 3-1(B) shows four alternate routes, that were considered but rejected, between Ontario and Whittier Narrows. Page 3-29 of the DEIS/R describes Routing Alternative # 2 as various routes using Mission Boulevard and Philadelphia Street and a route crossing Chino and Puente Hills. None of these alternatives are shown on Appendix A maps. The route alternative shown on Figure 3-1 (B) include routes along Riverside Drive, Philadelphia Street, and Corona Expressway. Figure 3-1(B) also shows a route alternate between Chino and Montebello. This route is not shown on Appendix A maps.

Routing Variation # 2 described on Page 3-30 is not shown on Figure 3-1(B) or the Appendix A maps. It is unclear from this description what the exact route for this alternative is since Peck Road, Gallatinat Street and Paramount Boulevard do not connect with each other or the proposed route in a logical manner. Appendix A Maps 20 and 21 show an alternate route along Workman Mill Road and Peck Road at the San Gabriel River crossing near M.P. 120. Appendix A Maps 21 and 22 show an alternate route starting 35-17 35-18

RESPONSE TO LETTER 35:

35-7 Tables 2-1 and 2-2 summarize information that is presented in Chapters 4 and 5. The complete analysis is presented in full in Chapter 5. The specific comments regarding errors and inconsistencies are addressed below.

35-8 It is not necessary to locate remotely automated block valves at every fault crossing due to the likelihood of movement on each fault, the pipeline grade at that location, and direction of pipeline flow may result in a negligible volume being released in the event of a rupture.

35-9 Though the pipeline route passes through the Kramer Hills which are locally steep, the route itself through the Kramer Hills will have a slope of 6 percent. Construction within the Kramer Hills can be achieved by conventional methods without significant slope stability and erosion problems.

35-10 The Cortese list has been reviewed for private property along the pipeline route. For 142 miles, all known contaminated sites have been identified. Mitigation of contaminated soils is possible and for excavation of trenches can easily be accomplished by removal of the contaminated soils and disposal at a certified landfill. To further define this mitigation measure it has been revised.

5.1.1-5(b) *Soils must be visually inspected as excavation occurs. If by visual inspection there is any evidence that contamination may be present, soil testing shall be undertaken at the identified location of contamination. No construction of the pipeline will occur within soil exhibiting evidence of contamination, until written approval from the regulatory agencies that have authority has been received.*

35-11 The Oil Spill and Contingency Plan (OSCP) will specify the procedures for soil and groundwater cleanup to protect sensitive and beneficial uses of surface and ground waters. The level of detail contained in an OSCP in not appropriate for an environmental document nor would it be beneficial to try and develop an OSCP for all routing alternatives, when no decision on the project has been reached. However, if the project is approved, an OSCP will be required and copies of that document will be available for public review at the BLM office.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

at the intersection of Dartee Avenue and following Rosmead Boulevard across the Whittier Narrows Dam to Gallatin Road. This alternate is shown following Paramount Boulevard from this point to Slauson Avenue where it rejoins the proposed route. 35-18

Page 3-5, Top of Page (Paragraph from prior page)

The Cajon Pipeline follows flood control channels for long stretches in Los Angeles County. One of the points the Cajon DEIS/R stresses is that the project has minimal or no impacts to the marine environment. Placing the pipeline within flood control channels provides it with direct access to marine environments, and direct impacts to the marine environment. What are these impacts and how will they be mitigated? What is the logic behind locating the line in these areas? 35-19

What refineries will the Hynes Terminal service? Does it provide access to Chevron's El Segundo refinery? Will construction of additional connections be necessary and, if so, what are the impacts of these connections? 35-20

Page 3-5, Second Full Paragraph

The discussion indicates that there will be an impressed current cathodic protection system. What type of coating system will the pipe have? Will the pipe be internally coated? 35-21

Pages 3-6, Table 3-1

The information in Table 3-1 regarding valve locations is inconsistent with the information included on Figure 3-2. Which is correct? What is the potential draindown for breaks in the pipeline? The line fill does not account for reactive times of the system or topography. For example, if the pipeline were to rupture at Whittier Narrows because of a flood event, what would the draindown be? 35-22

Page 3-9, Figure 3-2

The legend is incorrect on this figure with respect to block and check valves. The DEIS/R shows that check valves are installed on the downward gradient into the Los Angeles Basin. Check valves will only prevent back flow, and it is not possible that the oil will backflow from sea level to 4500 feet in elevation. Please explain the logic for the valve placement. 35-23

Page 3-13, Top of Page (Paragraph from prior page)

The discussion states that 'No staff would be maintained at Cajon Terminal.' However, the first paragraph under Maintenance and Leak Detection states 'Maintenance centers would be located at Adelanto and the Cajon Terminal.' Will there be personnel at the Cajon Terminal? 35-24

Page 3-13, First Full Paragraph

Will the SCADA system be a redundant system? What type of communications system is going to be used (e.g., microwave, radio, satellite, fiber optic, lease circuits)? 35-25

Page 3-13, Second Full Paragraph

How would the oil be heated? How would stored oil be reheated? Would the line be insulated? 35-26

8

RESPONSE TO LETTER 35:

35-12 The impacts of the Cajon Pipeline proposal are discussed in Section 5.1. A cultural investigation has not been completed for the Sycamore South alternative. No known cultural resources were identified for this area in the review which was undertaken for the Cajon Pipeline route which would also cover the area of this alternative. If this project is approved, including this alternative, then a 100% on-the-ground survey for cultural resources will be required.

35-13 Refer to response to Comment 35-3.

35-14 Pipe specifications have been included in Appendix C of the Final EIS/EIR.

35-15 Operation of Cajon Terminal and the All-American Pipeline Heater Station are addressed in response to Comment 44-5.

35-16 Figure 3-1 has been revised to show the proposed project, the Kramer South Alternative and the Sycamore South Alternative. Map 1 of Appendix A indicates an Alternate Route. This is the Kramer South alternative. It has been additionally named on these maps (Map 1, 2, and 3). The Sycamore South alternative is shown on Maps 11 and 12. It is now named to be explicitly clear. The scale of Figure 3-1 does not make it possible to clearly show the location of the Cleghorn alternative route. However, it has been indicated by an arrow on Figure 3-1 (a).

35-17 It was not felt necessary to show in detail in Appendix A the routes which were considered but rejected. Inclusion of rejected alternatives in Appendix A would mislead the reader, causing them to think they were still under consideration.

35-18 These alternate routes were identified as potential routes to avoid construction through the Whittier Narrows recreation area. The alternate routes have been removed from the Appendix A maps but is now discussed in Section 3.3.5 of the Final EIS/EIR.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

Page 3-13, Third Full Paragraph

What is a "line rider patrol?" Does the line rider drive along the pipeline? Would maintained roads be required? How will wildlife such as the desert tortoise be protected? 35-27

Page 3-14, Top of Page (Paragraph from prior page)

Would a receiving trap and launching trap be installed at the Adelanto Pump Station? What would the emergency shut-down procedures be at various locations along the pipeline and how long would such procedures take? What would the potential drawdown volume of crude oil be at sensitive receptors such as Cajon Creek, Rio Hondo, San Gabriel River and Los Angeles River? 35-28

Page 3-14, First Full Paragraph

The DEIS/R provides for response times typical of pipeline SCADA systems. However, they do not relate that spill response time to volume loss between valve sites and valve closure time. Please provide maximum spill volumes assuming a line rupture. 35-29

Page 3-14, Second Full Paragraph to End of Page

The Cajon Pipeline would be a complex project for oil spill contingency planning. What are the specific plans for sensitive water resources, threatened and endangered species, recreation areas, major faults, major roads, highways and street, and other sensitive features? 35-30

Page 3-15, Paragraph 1, Lines 7-8

What streams, highways, railroads, and utility crossings would require greater than 70 feet? How many more feet? 35-31

Page 3-15, Paragraph 3, Line 5

How would top soil be segregated? What depth? Where will it be stored? How will it be restored? 35-32

Page 3-15, Paragraph 4, Lines 4-6

What is meant by "An area 100 feet back along a frontage by 250 feet would be needed on each side of roads, railroads, and minor stream crossings that require boring?" Where are these locations? How much disturbance would result? 35-33

Where would the additional storage areas for equipment, pipe, and other materials be located? Would disturbance of natural areas or sensitive land uses occur? 35-34

Page 3-20, First Full Paragraph

What would the insulation and protective coating be? How would it be protected in transport? How would it be repaired in the field? What will be the process for coating field joints for cathodic protection and insulation of joints? 35-35

RESPONSE TO LETTER 35:

35-19 Constructing the pipeline within flood control channel rights-of-way avoids the impacts relating to traffic and collocation with construction in urban streets. Furthermore, it avoids the need to purchase right-of-way through private properties and the potential for severance of parcels. Placement of pipe in flood control channel also results in a greater probability that the pipeline would not be accidently disturbed through digging or excavation in public roadways. Though the pipe would be close to the marine environment, there is no direct connection, except through the Rio Hondo Channel and portions of the Los Angeles River. Both the Rio Hondo and Los Angeles River are lined and have been greatly disturbed and changed by man's activities. It is not a pristine environment and does not support highly sensitive wildlife habitat.

35-20 The downstream destination of the Cajon Pipeline is discussed in response to Comment 32-5.

35-21 The cathodic protection system consists of distributed impressed current sources (both rectifiers and bonds to existing systems) and supplemental galvanic anodes to protect the pipeline from the detrimental effects of external corrosion. In addition, to the cathodic protection system, a high quality external coating will be applied to the pipeline. The external coating will be covered by 1½ inch thick polyurethane insulation with an additional outer wrap. The pipe will not be internally coated.

Coated pipe will be handled with care prior to placement to protect the coating from damage. It will be lifted, lowered and suspended by the use of rubber or canvas slings. The pipe will be reinspected and repaired if necessary prior to lowering-in. Exposed pipe surface at tie-ins and field joints will be primed and hand-wrapped with six-inch wide Polykin tape. An insulation sleeve will be installed and covered with a tape outer wrap.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

Page 3-20, Fourth Full Paragraph, Lines 5-6

Where would ditch padding come from? What would the biological and land use impacts be on the areas from which ditch padding is obtained? What would traffic impacts be? What would be other environmental impacts on such sources for padding? 35-36

Page 3-20, Fifth Full Paragraph, Line 6 thru top of Page 3-22

What are all the streets crossed or paralleled by the proposed project? Contrary to the discussion, the streets are not all listed in Section 4.10. 35-37

Page 3-22, First Full Paragraph, Lines 3-4

What are all the water crossings? Contrary to the discussion, they are not all listed in Section 4.2. 35-38

Page 3-22, Fourth Full Paragraph

What would be the source for hydrostatic test water? How long would it take to treat the water at the GATX Carson Terminal? Would a modification to the existing NPDES Permit be required? 35-39

Page 3-22, Fifth Full Paragraph

The desert and riparian crossings are very fragile; how would they be restored? 35-40

Page 3-15, Paragraph 3

Would the pipeline segment within the city be completed in parallel to the 12-Gauge Lake through Cajon Pass to Mission Boulevard in Pomona? If so, three would appear to be a need to employ more than 12 persons.

The discussion indicates that 127 personnel will be required to construct the project. Please provide a table showing how 127 people can build 142 miles of pipeline plus 750,000 bbls of storage in 12 months. How many spreads would be required? The table should show progress by milepost to determine manpower loading. 35-41

Page 3-15, Paragraph 5

Can construction actually proceed at 0.25 miles per spread per day in urban areas? The key areas of concern would be construction in streets; how fast would this type of construction proceed? What lane closures would be required for street construction? How would emergency access be maintained? How would business access be maintained? 35-42

Page 3-26, Figure 3-11

The schedule is completely unrealistic. It is not feasible to purchase and deliver pipe prior to final design for construction. It is not reasonable to complete construction design, station equipment purchase and delivery, and pipeline and station construction, simultaneously. Normally it requires longer than 6 weeks to order line pipe and valves. Normally it requires longer than 6 weeks to abstract and acquire right-of-ways. What types of shortcuts and associated hazards would be necessary in order to accomplish these tasks the short time assumed? Is the schedule in Figure 3-11 correct? If so, has the applicant already initiated right- 35-43

RESPONSE TO LETTER 35:

35-22 Table 3-1 is correct. Figure 3-2 has been made consistent with Table 3-1.

The line fill is representative of volume between valves. Review of Table in 3-1 in conjunction with Figure 3-2 provides information on which line fill volume is relevant to the area of interest. The response time to an incident or rupture would add an additional volume of 104 barrels per minute. Detection of the rupture, however, is dependent upon its size; a large rupture would be detected within 15 seconds while smaller losses in the range of three to five BPH would be detected within a 12-hour time frame. The Whittier Narrows area (M.P. 122) is between two valves. Given the longitudinal profile, 5,329 barrels would flow from the pipe in additional to volume released due to response time.

35-23 The legend of Figure 3-2 has been revised to correctly show valve locations.

35-24 A maintenance facility will be located at Cajon Terminal, but will not be permanently staffed. Maintenance personnel will be on-call from the Adelanto Pump Station. This has been revised in the Final EIS/EIR.

35-25 The SCADA system will not be redundant, however in the event of power failure or loss of pressure the pipeline will be engineered to automatically shut-down. A Fiber Optic and/or Satellite System is proposed for pipeline communications.

35-26 Operations of the All-American Pipeline Heater Station are discussed in response to Comment 44-5.

35-27 A "line rider patrol" refers to either the ground line patrol, which will utilize vehicles where roads are available or on foot where road access is restricted, or aerial patrol flights which would check the line from Cajon Terminal to the Hynes and GATX Terminals. All ground maintenance activities are required to comply with mitigation measures proposed within the Biological Assessment. These mitigation measures have been incorporated into Impact 5.3.1-14. Virtually all of the route beyond M.P. 36 is in utility corridors and public right-of-way. The roads are paved and maintained by the respective jurisdictions.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

of-way acquisition, and purchase and delivery of pipe? Completion of the environmental review process in the first two months of 1993 is also unrealistic, both because of the flawed public review process for the technical appendices and the need to recirculate a revised DEIS/R to present legally required missing data and analysis. A more realistic schedule based on the above considerations should be published as part of the Revised DEIS/R. 35-43

Section 3.3 Project Alternatives
Page 3-39, First Full Paragraph thru Page 3-30, Paragraph 1

The discussion of the alternate routes that were eliminated from analysis is very general and it is not clear how the significance of potential impacts was determined. The discussion of Routing Variation # 2 which was developed to avoid impacts to wildlife in the area of the Whittier Narrows Recreation Area illustrates these deficiencies. While the DEIS/R eliminates this alternative due to significant traffic and residential land use impacts from construction, the DEIS/R does not describe the significance of the alternative's impacts. 35-44

Section 3.5 Relationship to Other Projects
Pages 3-39 thru 3-41

Although a number of other projects are listed, the DEIS/R does not discuss the relationship of these projects to the Cajon project. Chapter 5, Environmental Consequences does not address these projects by name and in fact does not quantify Cajon's role relative to cumulative impacts for any potential impacts. Additionally, this list of other projects is incomplete according to the limited information available to reviewers. For example, the Alameda Corridor project in planning along Alameda Street in Los Angeles is not mentioned nor is the Adelanto-Lugo Transmission project. (See 57 Federal Register #9701 of November 3, 1992.) These projects would have potential significant impacts on the Cajon Pipeline. 35-45

GEOLOGY/SEISMIC HAZARDS

Chapter 4.0 Affected Environment

Section 4.1 Geology, Seismicity and Soils
Page 4.1-2, Paragraph 2

The discussion of the area's historic seismicity lacks sufficient detail. Only six earthquakes are noted to have occurred in historic times. Reference to the magnitude (M) of various earthquakes is made without definition of the significance of this seismic rating. As a result, the reader is unable to evaluate the potential impacts that might be expected. 35-46

Page 4.1-2, Paragraph 3

This discussion identifies and discusses only four faults that are crossed by the pipeline. Numerous other faults are indicated on the maps included in Appendix A and in Table 3-1 and should be included in this discussion. One such fault is the Rialto-Colton fault which crosses at milepost 78. Moreover, there are other faults, such as the Cherry Hill fault (an active fault as designated by Los Angeles County) that cross the pipeline that are not, but should be included on the DEIS/R maps and included on the fault list. 35-47

Another shortcoming of the seismicity analysis is the failure to adequately identify on the maps or address faults with more than one trace such as the San Andreas fault. Also the Alquist-Priolo Act Special Study Zones are not indicated on the DEIS/R maps or described in the text. Further, faults near the

RESPONSE TO LETTER 35:

35-28 Receiving and launching traps are not required at the Adelanto Pump Station. The internal inspection pig can by-pass the Adelanto Pump Station. Please refer to Figure 3-4. Emergency shut-down procedures were included within Section 3 of the Final EIS/EIR. The drainline volume is discussed in response to Comment 35-22.

35-29 Refer to response to Comment 35-22.

35-30 The principal components of the Oil Spill Contingency Plan are summarized in section 3.2.2 of the Final EIS/EIR. However, specific elements to address the sensitive issues mentioned will not be complete until after final engineering design of the pipeline, but prior to operation.

35-31 Extra working area will be required for locations where boring will be utilized. These locations are listed in section 3.2.3 and in Table 4.10.1-1. Directional drilling will also require extra work space at crossings of the I-15, and the Los Angeles River. Table 4.10.1-1 has been updated.

35-32 Where required, top soil will be segregated when the initial clearing occurs and placed alongside the outer boundary of clearing on the spoil side or, in areas of high wind, under the spoil pile. Either method preserves the top soil so that it is the last to be spread upon the right-of-way during the final recontouring. The segregation is described in Mitigation Measure 5.3.1-3(d).

35-33 Additional space is required for equipment setup for boring of stream and road crossings. The additional space varies however, a maximum requirement is 250 feet by 100 feet. The longest dimension is usually at a right angle to the roadway or stream being crossed. These locations are referenced in response to Comment 35-31.

35-34 Additional storage areas will be located at the Cajon Terminal, Adelanto and Fontana. Refer to response to Comment 2-1.

35-35 Refer to response to Comment 35-21.

35-36 Padding will be purchased from commercial companies who provide such clean fill. Therefore, there would be no additional impacts. Traffic impacts have been considered as part of the construction operations.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

pipeline are not completely inventoried. For instance, the DEIS/R does not mention the San Jose fault, which is within one mile of the route. Seismic events on this or other faults near the project would cause adverse spill-related impacts not identified in the DEIS/R. 35-47

Finally, the discussion of seismic hazards lacks the detail necessary to assess the safety of the pipeline's design. Hazards such as liquefaction, ground rupture, and ground shaking are not adequately discussed or quantified. 35-48

Page 4.1-5, Fourth Full Paragraph

The DEIS/R states that the geologic conditions along the Mojave Desert Segment are shown on the Appendix A maps. However, the referenced maps are incomplete, with many maps containing no geologic description. 35-49

Page 4.1-6, Paragraph 3

The slope stability discussion is too general to allow meaningful evaluation of impacts. Slopes up to 14 percent are noted, although no indication is made of how many miles of such steep slopes are crossed. 35-50

Page 4.1-6, Paragraph 3

The groundwater discussion is too general to allow meaningful evaluation of impacts. The discussion fails to describe groundwater uses or existing water quality, and fails to present data as to shallow groundwater areas that may be impacted by the project. There is also no quantification of the miles of sensitive resources that may be impacted by the pipeline. 35-51

Page 4.1-6, Paragraph 4

The soil discussion does not include any information on the location of the identified types of soils or of the impacts from sensitive soil resources. This discussion fails to reference any maps which might identify such locations. Moreover, the maps in Appendix A which purport to include sensitive soils in fact include geologic units instead. 35-52

Page 4.1-8, Paragraph 3

This discussion is inadequate for the same reasons discussed above with respect to the seismic discussion on Page 4.1-2, Paragraph 3. Further, the DEIS/R maps do not designate the Special Study Zones for the four faults referenced in this paragraph as crossed by the pipeline. The DEIS/R maps also do not locate the trace of the Glen Helen fault. 35-53

Page 4.1-8, Paragraph 4

The discussion of slope stability for the mountain segment states that the pipeline does not cross any landslides. This statement is false, however, because south of Cajon Wash the pipeline would traverse steep slopes of 30 percent. The DEIS/R fails to, but must, describe the length of construction on these steep slopes, the nature of the soils in these areas, and soil susceptibility to failures as a result of such construction. 35-54

RESPONSE TO LETTER 35:

35-37 Table 4.10-1 lists the significant road and transportation corridor crossings along the pipeline route. Table 4.10-1 has been revised per comments received from city's along the pipeline route.

35-38 Table 4.2-1 lists the significant stream crossings along the pipeline route. Table 4.2-1 has been revised per comments received from city's along the pipeline route.

35-39 The source of hydrostatic test water has yet to be finalized. Mitigation measure 5.2.1-4 requires that all test water discharged at the GATX terminal be in accordance with the terminal NPDES permit requirements.

35-40 Restoration of desert and riparian habitats is addressed in Section 5.3 of the Final EIS/EIR.

35-41 A total of 227 workers will be required. This has been corrected in the Final EIS/EIR. Please refer to Table 5.9.1-1 for a breakdown of construction employment.

35-42 Interruption to traffic and roadway disruption is discussed in Section 5.10. Please refer to impact and mitigation measure 5.10.1-1.

35-43 The schedule has been revised to incorporate delay in the environmental permitting. The remaining time line provides sufficient time for acquisition of property and materials.

35-44 A screening process was undertaken prior to final selection of the Cajon Pipeline Route and also during the alternative selection process for the proposed project. This screening process was based on perceptions that the proponent had regarding various routes. The sections discussing route variations considered but rejected was included to provide a background to the public to illustrate the issues which were considered by the Cajon Pipeline Company. The intent of this section is not to present full environmental review of the routes rejected.

35-45 The projects discussed in Section 3.5 are those which would occur in the vicinity of the Cajon pipeline route which may affect or be affected by the proposed project. Table 3.3 has been revised following comments by various jurisdictions. Cumulative impacts are addressed in Section 5.13. The cumulative analysis incorporates the projects as listed in Table 3.3.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

Page 4.1-8, Paragraph 3

The description of the groundwater in the mountain segment is too general and does not evaluate the sensitivity of the aquifers mentioned or the existing water quality and uses of these resources. 35-55

Page 4.1-10, Paragraph 6

The discussion of groundwater in the urban segment only briefly mentions the shallow water table conditions and the presence of spreading grounds for recharge to the extremely sensitive aquifers in this region. A more comprehensive analysis is required. The proposed pipeline is adjacent to approximately 35 miles of surface water channels which directly supply the groundwater recharge areas, and the pipeline also directly crosses at least three spreading grounds. This discussion also fails to mention the Dominguez Gap spreading grounds, which the pipeline crosses. The DEIS/R also does not quantify the magnitude of shallow groundwater that may rise to the ground surface during sustained rainfall or runoff in the Whittier Narrows and Rio Hondo basin. It further fails to quantify impacts to the project such as dewatering that could be required in these areas. Omission of such information results in an inability to assess impacts from the project, such as dewatering, that could adversely affect these water resources. 35-56

Page 4.1-11, Paragraph 4

The Sycamore South Segment Alternative geology is described as identical to the impacts of the proposed route. This is inconsistent with the discussion later in the DEIS/R at 5.1.1-3(a) regarding Mitigation Measures which states that this alternative was identified to avoid steep slopes along the proposed route. If this is so, the geology section for the alternative should include information sufficient to determine the significance of the potential slope failures and allow an evaluation of the environmental differences between the alternative and the proposed routes. As written, this discussion does not allow such an evaluation. Moreover, as noted above, the discussion for the geology of the proposed project is also too general to permit such an evaluation. 35-57

General Comments on Section 4.1 Geology, Seismicity and Soils

In general the Affected Environment discussion lacks the details necessary to properly describe potential environmental impacts from this project. 35-58

The DEIS/R also does not include any data on the presence of hazardous waste sites and since Impact 5.1.1-5 under Geology addresses the excavation of contaminated soils, the DEIS/R should also include discussion of contaminated sites. Public Resources Code Section 21092.6 requires consultation with the "Cortese List" to determine if a proposed project or alternative is located on a listed site. The DEIS/R fails to include any information regarding analysis of the project's or alternatives' relation to Cortese List sites. Such omissions are significant because review of available information for the Cajon alignment in the area south of Carson Street to the southern terminus of the pipeline indicates that a number of Cortese List sites exist near the proposed route. For example, the proposed route crosses the Alameda Street Sanitary Landfill which is listed on the CERCLIS and Los Angeles County lists of potentially contaminated sites. A US EPA study of the Alameda Street Landfill indicated that industrial wastes had been disposed at this facility. Other potentially contaminated sites that should be addressed in the DEIS/R include Hardwick Disposal, State Salvage, Brite-Sol Cleaning, and Advance Holding Co. 35-59

13

RESPONSE TO LETTER 35:

35-46 Many earthquakes have occurred in pre-history. However, only significant earthquakes within the region are required to provide a background to the seismic activity of the region. Definition of the seismic rating has been included in Section 4.1

35-47 The discussion identifies and describes the six active fault zones which the route crosses. Discussion of the associated Alquist-Priolo Studies Cores has been included in the text.

35-48 Liquefaction, ground rupture, and ground shaking are addressed in Section 5.1.

35-49 The Appendix A route maps were included to show general locations of geologic features.

35-50 The distance over which steep slopes are crossed has been included in the discussion on slope stability within the Final EIS/EIR.

35-51 In regard to the level of detail please refer to the opening discussion of the responses to this comment letter. Specifically, ground water basins along the pipeline route are used for domestic, agricultural and industrial water supply. Construction will not impact the use of these basins but if an oil spill was to occur it could affect utilization of these basins. This impact is addressed in Impact 5.1.1-6.

35-52 The soil discussion is given by general geographical location. To identify individual soil units does not further define the soil impacts identified within the Draft EIS/EIR which relate to erosional hazards, and potential contamination. Soil locations and characteristics were determined from soil surveys and these have been referenced within the Final EIS/EIR.

35-53 Refer to response to Comment 35-46.

35-54 The route does not cross any landslides. The area to which the commentor refers has not had any known landslide activity.

35-55 The pass area is mountainous with alluvial streams the main groundwater source. This area is not defined as a groundwater basin as such. Base flow from the mountain streams contribute to groundwater resources in the Rialto Cotton/Lytle Creek basin.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

Chapter 5.0 Environmental Consequences

Section 5.1 Geology, Soils and Seismicity
Page 5.1-1, Paragraph 2, Standards of Significance

The standards of significance for geologic resources are incomplete for the expected impacts for the project. Potential impacts that are not addressed include alterations to topography, effects on unique geologic features, and secondary seismic effects. The secondary seismic effects that should be addressed in project design include strong ground motion and liquefaction. The data presented in the affected environment (Section 4) is inadequate to evaluate the significance of these impacts. Although these potential impacts can be mitigated through proper engineering design, if the incomplete data used in the DEIS/R is used to determine areas of concern, critical seismic areas may be overlooked. 35-60

The discussion of the significance criteria for soils resources fails to quantify what constitutes a significant increase in wind or water erosion. As noted previously, the amount of sensitive soils crossed by the pipeline route is not described in the DEIS/R. The significance of potential impacts to prime agricultural soils and reduction of productivity due to conversion to nonagricultural uses is not considered in the DEIS/R. 35-61

The significance of impacts to groundwater resources is not stated. Also the potential impacts to groundwater for consumption of this resource for hydrostatic testing are not evaluated in the DEIS/R. 35-62

Page 5.1-3, Mitigation Measure 5.1.1-2(a)

Mitigation Measure 5.1.1-2(a) identifies the Sycamore South Segment Alternative as preferred to avoid steep slopes. As noted previously, information on the project or this alternative is not adequate to evaluate potential impacts for construction on slopes for either the proposed or alternate route. 35-63

Page 5.1-4, First Full Paragraph

Areas of potential liquefaction are noted as representing a potential adverse impact ("moderate liquefaction potential"). These areas should be specifically identified and included in the Appendix A maps. Instead, these areas are only generally described and are not mapped, and the number of miles of the route that cross these hazardous areas is not stated.

Moreover, the areas the DEIS/R refers to as having moderate susceptibility are mapped in the Los Angeles General Plan as liquefiable. Please explain and correct this inconsistency. 35-64

Page 5.1-4, Last Paragraph

This section notes that areas of sensitive soils that are highly erodible exist along the pipeline route. These areas of sensitive soils are not included on the Appendix A maps and the number of miles of pipeline that cross these sensitive soils is not stated. Special significance should be noted for sensitive soils on steep slopes or near surface waters where potential impacts may be the greatest. 35-65

Page 5.1-5, Third Full Paragraph

This paragraph notes the excavation of contaminated soils as a potentially significant impact. However, no description of potentially contaminated sites is included in the Affected Environment section. Such an assessment is now required by CEQA, even before this express CEQA requirement, however, 35-66

RESPONSE TO LETTER 35:

35-56 The pipeline impacts in relation to the Etiwanda Creek percolation basins, Whittier Narrows Dam, the Rio Hondo Spreading Grounds, and the Dominguez Gap percolation basins are discussed in Section 4.2 and 5.2. Dewatering impacts have been included within Section 5.2.

35-57 The discussion of the Sycamore South Segment Alternative states that elevation varies from 1,920 to 2,200 feet. Slopes gradients are less than 5 percent. Except for that distance of 2 miles, for which it deviates from the proposed route, this alternative is as described for the proposed route.

35-58 Refer to introductory discussion in response to Letter 35.

35-59 Refer to response to Comment 35-10.

35-60 Pipeline construction will not result in a change to the topography or impact any unique geologic features. Liquefaction is addressed in Impact 5.1.1-3. Ground shaking is addressed in Impact 5.1.1-1.

35-61 "Significance" in terms of wind or water erosion would refer to any erosion which results in degradation in water or air quality.

As stated in the project description chapter of the document, the proposed Cajon Pipeline route is located within designated utility easements and goes through a majority of federal lands (both BLM and Forest Service) along the northernmost portion of the route. In areas outside of federal lands, the route is located within public rights-of-way, including streets and local flood control facilities. The proposed project therefore would not create adverse impacts on any designated prime agricultural lands/soils.

35-62 The source of water for hydrostatic testing has not yet been finalized. Impacts to ground water resources would occur in the event of pipeline leak or rupture. This impact is addressed in Impact 5.1.1-6.

35-63 Information pertaining to the extent of steep slopes has been added to the Final EIS/EIR in response to Comment 35-57 and will provide the necessary information that the commentor requires to evaluate the potential impacts for construction on slopes.

35-64 Areas of liquefaction are described in Section 4.1 of the Final EIS/EIR. Moderately liquefiable and liquefiable are consistent. The degree of potential for liquefaction is dependent upon the ground water level and the soil type.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

evaluation of contamination-related impacts has been a clear component of required CEQA evaluation. (See, eg., McQueen v. Board of Directors of the Midpeninsula Regional Open Space District (6th Dist. 1988) 202 Cal.App.3d 1136.) The pipeline crosses up to 50 miles of industrial land-use areas as mapped in the DEIS/R. As noted previously, potentially contaminated sites are known to exist along portions of the pipeline route where data was available. Listed sites and the potential impact on the pipeline should be evaluated for the entire route. 35-65

Page 5.1-6, First Full Paragraph

This section fails to evaluate the impact to sensitive groundwater recharge areas that the pipeline crosses. The effect of a pipeline rupture in such recharge areas should be specifically evaluated because of potential groundwater contamination. 35-67

Page 5.1-6, Last Paragraph

The description of the Kramer Segment Alternative impacts states that the Kramer Segment Alternative would be preferable because there are fewer steep slopes to cross (2 percent grade for the alternative versus 14 percent for the proposed route). The Affected Environment section (at Page 4.1-6, Paragraph 2 and 4.1-11, Paragraph 3) which discusses the geology of both routes provides insufficient details to allow a determination of the magnitude and importance of this potential constraint. The difference in the possible slope failures for these route alternatives must be quantified in order for the responsible agencies to select the least environmentally sensitive route. 35-68

GROUNDWATER/HYDROLOGY

Chapter 4.0 Affected Environment

Section 4.2 Onshore Water Resources
Pages 4.2-1 thru 4.2-5

The list of "Stream Crossings Along Route of Cajon Pipeline" in Table 4.2.1-1 is incomplete. For example, Puente Creek, near MP 116, is not listed. Intermittent streams which may be impacted during the wet season by construction also should be, but are not, included so these locations could be mitigated. Also, overall climatic data should be included so that it can be determined when intermittent streams may be flowing. 35-69

Are all the drainage-ways capable of carrying oil in a potential spill listed in Table 4.2.1-1? The project parallels streams for a number of miles; for each stream, the location (including milepost), proximity to the stream and stream characteristics are not but should be described. 35-70

The DEIS/R fails to summarize the hydrologic characteristics of streams that are crossed. For each stream crossing, the DEIS/R should answer the following questions: What are the bed and bank materials and characteristics in the crossing vicinity? What are the scour characteristics of the streams crossed? How deep is the likely scour? Are there existing structures at the crossing that will influence the scour depth? Such information is needed in order to determine if the pipeline could be damaged in a flood event. 35-71

RESPONSE TO LETTER 35:

35-65 Refer to response to Comment 35-52.

35-66 Refer to response to Comment 35-59.

35-67 Refer to response to Comment 35-56.

35-68 Information pertaining to the extent of steep slopes has been added to the Final EIS/EIR in response to Comment 35-57. This will provide the necessary information that the commentor requires to evaluate the potential impacts for construction on slopes.

35-69 Table 4.2.1-1 has been revised to include Puente Creek and other crossings indicated by interested jurisdictions. The major drainage areas in the desert areas have been included. Many smaller washes which are not "blueline" streams and which are not easily identified do exist. However they are not readily distinguishable except in extreme runoff events. It is not necessary to include these as stream crossings. Overall climatic data would not give an indication when intermittent streams may be flowing. The definition of the wet season has been defined in Section 4.2.1.

35-70 Table 4.2.1-1 includes channels which are of concern not necessarily based on the ability to conduct oil flow. This table has been revised per jurisdictions comments to include some unnamed drainage channels. If the pipeline is paralleling a stream this has been indicated in Table 4.2.1-1.

35-71 Hydrologic characteristics, in this case bed type has been added to Table 4.2.1-1. Information pertaining to scour is only of importance to perennial unarmored channels. In this case scour is of major concern at Cajon Wash. Analysis of this impact is addressed in Impact 5.2.1-6.

COMMENT LETTER 35: PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

Chapter 5.0 Environmental Consequences

Section 5.2 Onshore Water Resources
Page 5.2-5, Last Paragraph thru Page 5.2-8

This discussion fails to adequately discuss the oil spill impacts to onshore water resources caused by the Cajon Pipeline. Rather than specifically identifying and quantifying oil spill impacts, the DEIS/R attempts to sidestep the issue and moves directly to consideration of mitigation by asserting that the risk of oil spills "can be corrected by system design." For example, with respect to M.P. 116-139, which is a distance of approximately 22 miles, the Proposed Project would parallel waterways and flood control corridors. What is the likelihood of a spill entering the Whittier Narrows Flood Control Basin, Rio Hondo, Los Angeles River, or San Pedro Bay? What are the likely interception points for oil? What are the potential impacts on water users, riparian vegetation and wildlife? 35-72

Page 5.2-8 Mitigation Measure 5.2.1-6

What burial depth would be required on streams with high scour potential? How much disturbance will be required to bury the pipeline at these high scour potential locations? Unless scour depth is analyzed, the disturbance required cannot be quantified and impacts to biological, land use and other resources cannot be analyzed. 35-73

Page 5.2-9, Paragraph 3-4

This discussion should be updated to reflect the fact that Pacific Pipeline has further reduced potential construction impacts by planning to construct 56 of its 83 coastal stream crossings in existing fill or to bore and avoid any stream disturbance. Thus, stream crossing impacts would be further reduced from those noted in the Pacific Pipeline PEA which was used as the source for the discussion at page 5.2-9. 35-74

BIOLOGY

Chapter 4.0 Affected Environment

Section 4.3 Biological Resources
Page 4.3-1, Paragraph 3, Line 6

Field surveys for birds should have continued through June and July to detect late-nesting species such as the yellow-billed cuckoo. 35-75

Page 4.3-1, Paragraph 4, Entire Paragraph

There is a complete lack of detail and specificity as to the methodology of the field surveys. The DEIS/R fails to describe the survey methodology or to reference materials in the technical appendices that may contain such information. 35-76

Page 4.3-1, Paragraph 4, Line 4

What is meant by "vicinity"? Some quantification of this statement is necessary to delimit the survey areas. 35-77

RESPONSE TO LETTER 35:

35-72 A rupture in the pipeline could potentially occur anywhere along its entire length due to earthquakes, or disruption from nearby construction interference. The probability of such an event occurring is speculative to determine for such a unique or extreme event. The spill size and probability over the life time of the pipeline is determined in Section 5.12. The Oil Spill Contingency Plan will fully address specific of containment for each waterway or sensitive area.

35-73 The pipeline would be placed below the scour depth calculated on a 100-year storm within that drainage to ensure that the pipeline is not exposed. The construction right-of-way is 70 feet. To dig trenches for severe scour locations will require more than 70 feet construction width, but the exact extent will not be known until these engineering calculations are made and this won't occur until a final route is selected and final engineering designs completed. However, the areal extent is small, especially when compared to the standard construction right-of-way for this pipeline, and though not quantifiable at this time, it is not statistically significant to preclude meaningful analysis of to biological, land use and other resources.

35-74 This updated information has been included in the discussion of the Pacific Pipeline on page 5.2-10 of the Final EIS/EIR.

35-75 Bird surveys were carried out through May and June to protocol required by the CDFG and the USF&WS.

35-76 Field survey methodology is fully described in the technical reports prepared for the Draft EIS/EIR. For conciseness and readability, this information was not included within the Draft EIS/EIR itself.

35-77 The term "vicinity" is used to denote riparian vegetation found within 0.25 miles of the pipeline route along the described water systems. Surveys were carried out in these riparian communities, extending to a distance from the pipeline route determined by qualified biologist in the field to be biologically significant.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlain
January 4, 1993

There is no mention of the amount of time spent conducting the surveys during the stated months, nor any evaluation of the general climatic conditions encountered as being suitable for species detection. 35-78

Pages 4.3-2 thru 4.3-4 (Terrestrial Habitats)

This section fails to provide any specific information concerning the amounts of upland cover types and wildlife habitat that would be disturbed within the area by project implementation. Such information is necessary in order to provide meaning to the statement that "approximately 630 acres of common native plant communities" would be disturbed by construction. (See Environmental Consequences, paragraph 5.3.1-3.) Without this information, the reader cannot judge the actual magnitude or significance of the disturbance. Habitat value (measured partially by species diversity, richness and rarity) varies from one community to another. The loss of acreage in one community is not always equivalent to the loss of an equal amount of acreage in another. 35-79

Page 4.3-6, Paragraph 5

The EIS/R description of stream crossings is superficial, lacking sufficient detail to determine the appropriateness of the impact discussion or adequacy of the mitigation measures. Eighteen water systems are identified as being crossed or paralleled by the proposed route, and three (Cajon Creek, Rio Hondo and Whittier Narrows) are identified as containing riparian vegetation (see page 4.3-1). There is, however, no site specific information concerning the width of these crossings, the particular species composition and relative habitat value at any of these locations. Within the cursory discussion of the Southern Riparian Scrub there is no mention whatsoever of Rio Hondo, although a fourth stream, San Jose Creek (which was not mentioned in the initial list of crossings) is reported in this paragraph to contain riparian vegetation. 35-80

Page 4.3-6, Paragraph 1, Line 1

Couch's spadefoot toad (Scaphiopus couchi) is not found in the project area. This species is restricted to the lower Colorado River valley in California. The Western spadefoot toad (Scaphiopus hammondii) may potentially occur within the southern portion of the project area. 35-81

Page 4.3-6, Paragraph 5, Lines 4-5

Field surveys, conducted to identify populations of sensitive species, do not cover an appropriate study area. The DEIS/R states that "field surveys [for botanical resources] were conducted in the northern half of the pipeline route." There is no indication that the entire line was surveyed, and therefore, no assurance that all sensitive species potentially occurring within the zone of impact were adequately identified. 35-82

Page 4.3-7, First Full Paragraph, Line 3

There is no discussion of the criteria used to reduce the number of sensitive species potentially found along the pipeline right-of-way. What criteria were used to eliminate 23 potential species? 35-83

Page 4.3-8, Table 4.3.1-1

The list of Sensitive Plant and Animal Species With the Greatest Potential to Occur Along the Cajon Pipeline Route (Table 4.3.1-1) has many omissions. The following plant species, not included in the list of plants targeted during the field surveys, have been found within the region and may also occur within the route: 35-84

17

RESPONSE TO LETTER 35:

35-78 Refer to response to Comment 35-76.

35-79 The disturbance of 630 acres represents construction along approximately 74 miles of the pipeline route. The occurrence of the different plant communities are described in Section 4.3. Disruption will occur to approximately 25 acres of desert saltbush, 212 acres of mojave creosote, 106 acres of joshua tree woodland, 76 acres of desert chaparral, and 190 acres of intergraded communities of joshua tree woodland, semi-desert chaparral and chemise to southern mixed chaparral. These last communities are found south of Baldy Mesa, where disturbance has occurred and recolonization by a variety or native and non-native species has occurred. These acreages do not account for small islands or other communities within or mosaic with more dominate communities.

35-80 The pipeline route along the Rio Hondo is not in the vicinity of any Southern Riparian Scrub. Though the riparian scrub in the Whittier Narrows and the San Jose Creek is within the ROW of the pipeline, the pipeline will not disrupt these small stands of vegetation.

35-81 This has been corrected in Section 4.3.

35-82 Field surveys were not conducted from M.P. 75 to M.P. 142 as the pipeline is proposed to be located within road rights-of-way or on the levees of flood control channels which are not vegetated.

35-83 Species were dismissed from sensitive species list dependent upon status of populations within Southern California, last known siting, presence of habitat along right-of-way and status of habitat actually occurring along right-of-way.

35-84 Of the species suggested by the commentor, a number are found in habitats which are not present along the pipeline route. Of the species listed, the following have been included in Table 4.3.1-1: Bell's sage sparrow, burrowing owl, and orange-throated whiptail.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

Species	Status (Fed/State/CNPS)
Hemizonia arida	C1/R/1B
Phacelia ambigua	C3c/--/2
Selerocacus polyancistrus	C3c/--/4

Bell's sage sparrow is missing from the list but is listed as observed during the field surveys for this project. Other sensitive bird species which should be considered for placement in this table include:

Species	Area Found
Athene cunicularia (Burrowing Owl)	Northern portions of the line
Strix occidentalis (Spotted Owl)	Cajon Wash and Lytle Creek
Asio flammeus (Short-eared Owl)	Wintering individual on Baldy Mesa
Buteo swainsoni (Swainson's Hawk)	Spring and Summer migrant to desert
Buteo regalis (Ferruginous Hawk)	Winter migrant to desert
Falco columbarius (Merlin)	Fall and Winter migrant to desert and mountains
Charadrius montanus (Mountain Plover)	Fall and Winter migrant to arid foothills, uplands and desert
Geothlypis trichas (Common Yellowthroat)	Riparian corridor in Cajon Wash and Lytle Creek

35-84

Sensitive mammal species which should be considered for placement in this table include the San Diego Desert Woodrat (Neotoma lepida intermedia) which is found in the southern portion of project area.

Sensitive fish species which should be considered for placement in this table include the Rainbow Trout (Oncorhynchos mykiss) which is found in the upper portions of Lytle Creek and Cajon Wash.

Sensitive reptile species which should be considered for placement in this table include the Orange-Throated Whiptail (Cnemidophorus hyperythrus) which is found in Cajon Wash and the Southern Rubber Boa (Charina bottae umbratilis) which is found in habitats similar to those of the Southern Sagebrush Lizard, which was included in the table.

Page 4.3-15, Paragraph 3

The DEIS/R understates the situation when it says that the Mohave ground squirrel (Spermophilus mojavensis) "may occur along the proposed pipeline ROW". In fact, the preferred pipeline route passes through the southern half of the range of the Mohave ground squirrel and thus passes through excellent habitat for that species. Individual densities of the Mohave ground squirrel range from occasional to common across this region. CDFG and BLM have developed a cumulative impacts assessment method for surveying for Mohave ground squirrels which precludes trapping efforts as a survey method. Emphasis is placed on habitat evaluation and degree of disturbance with the new method. This has important implications for pipeline surveys, but is not discussed in the text.

35-85

Page 4.3-18, Third Full Paragraph

Other documents (Dames and Moore EA for U.S. Sprint Fiber Optic Cable, 1988) list Orange-throated Whiptail as occurring in Cajon Canyon and Cajon Wash. What criteria are used to dismiss its occurrence within the project area?

35-86

RESPONSE TO LETTER 35:

35-85 The Mohave ground squirrel may occur along the pipeline right-of-way. It was not found during field surveys.

35-86 In the review of sensitive species within the study area, no prior record of the Orange-throated whiptail was found. The western whiptail lizard was observed during field survey but not the orange-throated whiptail.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

Page 4.3-20, Paragraph 1

The Kramer Segment was not studied at the same level of detail as the proposed route. The proposed route analysis included studies from May through August 1992; the Kramer Segment analysis included studies only from June and July 1992. 35-87

Page 4.3-20, Paragraph 2, Lines 1-3

The DEIS/R states that the Sycamore South Segment Alternative has had no biological investigations and therefore the presence of biological resources within the alternative study area is not known. The lack of biological data concerning this alternative renders the discussion of alternative project impacts incomplete. 35-88

General Comments on Section 4.3 Biological Resources

There are major data gaps in this section which preclude a complete impact assessment and preparation of mitigation procedures. First, the data basis for the alternatives are not comparable to that for the proposed project. Second, no data are included to quantify vegetation communities, especially sensitive communities such as riparian and wetland areas. Third, no data are included for the Los Angeles Basin. Fourth, maps in Appendix A are incomplete in that they do not identify locations of vegetation and wildlife communities, or of sensitive plant and animal habitats. Fifth, important threatened and endangered species are not described in proper detail to complete impact analyses. 35-89

Chapter 5.0 Environmental Consequences

Section 5.3 Biological Resources
Page 5.3-3, Impact Statement 5.3.1-3 and Last Two Full Paragraphs

The loss of and disturbance to riparian habitats is not quantified. What will the riparian losses be at each stream crossing and each flood control area crossed? Will the trenched stream crossings have to disturb more than a 70 foot area to achieve the required burial depths? What will the area of disturbance be for each crossing? What plant and animal communities will be removed and how will they be mitigated? 35-90

Page 5.3-4, Mitigation Measures 5.3.1-3(b), (c), (e)

The discussion of these mitigation measures is cursory at best. It fails to include any specifics as to how the measures will be implemented, and fails to analyze the effectiveness of the measures. This is particularly important with respect to these measures because of the general lack of success of other attempts to restore desert ecosystems. For example, Measure 5.3.1-3(b) states that "native species shall be used to revegetate areas disturbed by the project." However, specific seed prescriptions should be but are not presented. In addition to the use of native versus non-native species, the appropriateness of any seed mix is founded upon the species composition, the site specificity of the mix, the use (or exclusion) of non-native nurse crops, and the rate of application. Since the mixes remain unspecified, it is impossible to assess the expected effectiveness of the mitigation.

Likewise, the "appropriate technique" for relocating Joshua Trees, mentioned in measure 5.3.1-3(c), is not disclosed. Since the method of transplanting has not been stated, it is not possible to judge whether the mitigation will be successful and reduce the impact. 35-91

RESPONSE TO LETTER 35:

35-87 The Kramer segment Alternative was surveyed to the same level of detail as the proposed Cajon Pipeline route. The commentor is incorrectly applying the length of time from May to August as the extent of time surveys occurred. Surveys were undertaken at several times between May and August. Due to the environmental review, additional surveys were later undertaken for the proposed route as it was identified as a preferable alternative. Methodology for the field surveys has been revised to more clearly present this information.

35-88 The Sycamore South Alternative was identified as a preferable alternative in late August after potentially significant geological impacts, due to construction on slopes on the northern side of the Highway 15, were identified. At that time, it was not appropriate to undertake further biological survey due to the season. After discussions with U.S. Forest Service personnel it was deemed appropriate to identify this alternative as a preferable alignment to avoid steep slopes, but that a biological survey would be required, if the route was selected.

35-89 The extent of information provided on the alternatives has been summarized to avoid repetition and for conciseness. Riparian and wetland habitats found within the ROW are addressed in Section 4.1. Vegetation and wildlife is described by community and occurrence. The pipeline is located within road rights-of-way and flood control levees from M.P. 74 to M.P. 142 and would not disturb any significant biological communities. The location of plant communities is described by milepost in the text of Section 4.3.

In preparing the EIS/EIR, a lot of these issues were examined in more detail to assess and determine the existence and level of significance of environmental impacts. However due to the need for clarity and conciseness the information was summarized. The CEQA Guidelines require that the EIR should be "analytic rather than encyclopedic", (Guidelines, Section 15006).

35-90 No major stands of riparian habitat would be disturbed by trenching activities across the southern reaches of Cajon and Lytle Creeks. Disturbance will occur to areas of Riverside Alluvial Fan Sage scrub and to intergraded communities of Chemise or Southern Mixed Chaparral. Construction width should be adequately accommodated within the 70 feet ROW width at these locations. Mitigation for revegetation is addressed in Mitigation Measure 3.3.

COMMENT LETTER 35: PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

Further, mitigation measure 5.3.1-3(e) states that sensitive plant communities will be avoided, but gives no indication which communities are threatened, the extent of such communities along the pipeline route, or how the avoidance will take place. 35-92

Pages 5.3-10 thru 5.3-11

Impact Sections 5.3.1-11 and 5.3.1-12 state that implementation of Mitigation Measures 5.3.1-11(a), (b) and (c) would reduce biological impacts of an oil spill in terrestrial or aquatic environments to less-than-significant levels. Although impacts to terrestrial plant and animal communities would be relatively less than those caused by a spill in an marine environment, the impacts could still be significant, especially if the spill extends beyond the pipeline ROW. For example, the pipeline crosses large areas of Category 1 desert tortoise habitat and areas supporting moderate densities of the Mohave ground squirrel. Direct impacts (e.g., immediate mortality) and indirect impacts (e.g., impacts to food plants and clean-up activities) could be significant despite implementation of the proposed mitigation measures. Was there any consideration of the effectiveness of such tortoise mitigation that was done for the AAPL, Kern River and Mojave pipelines? 35-93

As to impacts to aquatic habitats, the pipeline crosses, or is in close proximity to, important freshwater and marine environments. The assertion that impacts to these environments would be reduced to less-than-significant levels is a misstatement. The proposed mitigation measures may reduce the significance of an oil spill but a spill could still be significant depending on its location and extent. 35-94

Page 5.3-11, First - Third Full Paragraphs

The proposed pipeline route veers away from Cajon Wash/Lytle Creek at a point approximately 12-14 miles upstream from the confluence of this drainage and the Santa Ana River. There is no discussion in the text about oil spill impacts to sensitive species (e.g., Santa Ana Sucker (Catostomus santanae)) occurring in the upper and middle reaches of the Santa Ana River. Additionally, there is no discussion regarding oil spill impacts to sensitive species in the lower and brackish portions of this drainage (e.g., California Killifish (Fundulus parvipinnis) and Pacific Lamprey (Lampetra tridentata)). 35-95

General Comments on Section 5.3 Biological Resources

The Biological Resources section of the Environmental Consequences section has major analytical flaws. The lack of impact quantification and the lack of details regarding numerous sensitive plant and animal species and habitats precludes an accurate or complete assessment of impacts. The discussion of mitigation measures lacks details regarding where, when and how the measures are to be implemented; the section also does not describe the effectiveness of the mitigation measures. Oil spills are not addressed with respect to the Cajon Pipeline segment or the AAPL segment. No data were presented for the alternatives or for the Los Angeles Basin, and impact analyses for these are thus not possible. 35-96

AIR QUALITY

Chapter 4.0 Affected Environment

Section 4.4 Air Quality

No comments on this section at this time. Detailed comments will be submitted on air quality (and other issues addressed in the technical appendices) at a later time. 35-97

RESPONSE TO LETTER 35:

35-91 A number of the concerns of the commentor are addressed in more detail by Letter 6 and Letter 34 received from the California Native Plant Society. Refer to detailed comments made in these letters and in particular responses 6-5, 6-11 and 34-12.

35-92 Refer to response to Comment 6-13.

35-93 In compiling the mitigation measures for the proposed pipeline, the experience of the BLM in previous pipeline projects was utilized as a starting point. More pipeline mitigation measures for the desert tortoise are incorporated in the Biological Assessment/Evaluation which has been submitted to the CDFG and USFWS.

35-94 Valve locations and system design has been undertaken to reduce spill size at sensitive locations. The reduction in spill size in conjunction with appropriate and successful clean up after a spill would result in the return of the affected area to a pre-spill condition.

35-95 For oil to reach 12 to 14 miles downstream, the rupture would have to be major and occur at times of high flow conditions in the streams being crossed. The probability of such an event occurring at that exact location in flood conditions is low. The potential for crude oil to reach these locations have been further reduced by ensuring that the amount of oil lost would be small by the location of valves at stream crossings.

35-96 These comments are addressed in the specific comments above.

35-97 Comment noted. See response to Letter 50.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

Chapter 5.0 Environmental Consequences

Section 5.4 Air Quality
Page 5.4-1, Last Paragraph

The South Coast Air Basin ("SCAB") significance levels used in the DEIS/R are based on criteria established in the 1987 SCAQMD EIR Air Quality Handbook based on New Source Review (NSR) thresholds that were available in 1987. The Handbook states that, "Should the NSR rule change, these thresholds will also change." The NSR rule was revised substantially in July 1990 and a zero threshold was established for all pollutants. The revised Air Quality Handbook (September 1992) specifies the following thresholds: 35-98

ROG	- 55 lb/day
NO_x	- 55 lb/day
CO	- 550 lb/day
PM_{10}	- 150 lb/day
SO_x	- 150 lb/day

The DEIS/R references to SCAB significance levels should be changed to reflect current policy.

Page 5.4-3, First Full Paragraph

The discussion of the "management practices" to be employed to minimize construction impacts is entirely superficial and inadequate. First, there is no indication as to the quantity of emissions that are to be minimized by which practices. For example, although the DEIS/R states that "unnecessary idling of equipment would be controlled and minimized by the project sponsor," (at Page 5.4-3), there is no performance standard or other enforceable mitigation commitment. Second, there is no assessment as to the effectiveness of each specified "management practice." Third, the scope of the mitigation measures being considered is entirely too narrow. There are numerous other measures that should be considered, including process changes, as well as a host of mitigation techniques for specific pollutants. 35-99

Page 5.4-3, Impact 5.4.1-2, Last Full Paragraph on Page

The discussion of air emissionS resulting from pipeline operation is incomplete. Operation of the Cajon Pipeline would involve many indirect emissions which are not discussed. Such indirect emissions include emissions from power plants and refineries (see discussion below re: page 5.4-6) and from heaters on the All American Pipeline. Operation of the Cajon Pipeline would result in additional throughput in the All American Pipeline which would be used to transport oil from Santa Barbara County to the Cajon Terminal. Indirect emissions estimates from the All American Pipeline (as well as other alternative pipeline projects) are available in Appendix A of the Pacific Pipeline PEA. 35-100

Page 5.4-6, Paragraph 3

This discussion should be modified to reflect that Pacific Pipeline construction emission estimates have been revised based on a more detailed inventory of equipment usage. Revised estimates are shown in the table below. Santa Barbara County estimates were included in the Authority to Construct Application to the Santa Barbara County APCD and are based on a detailed analysis that includes separate estimates for rural and urban areas. Estimates for Ventura and Los Angeles Counties are prorated based on miles of construction in rural and urban areas and on number of pump stations. 35-101

RESPONSE TO LETTER 35:

35-98 The thresholds from the revised Air Quality Handbook have been revised in the text on Section 5.4.

35-99 As a result of comments by the South Coast Air Quality Management District, mitigation measures for emissions have been revised.

35-100 The thruput capacity of the AAPL will not change though present operations which do not utilize the AAPL's full capacity may. Refer to response to Comment 44-5.

35-101 Comment noted. These emissions estimates have been revised.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

Pacific Pipeline
Summary of Estimated Construction Air Emissions
(tons)

County	ROG	NO_x	SO_2	CO	PM_{10}
Santa Barbara	10.6	55.0	2.1	148.1	13.4
Ventura	8.8	47.6	1.9	119.1	12.3
Los Angeles	14.4	85.6	3.3	188.2	20.9
Total	33.8	188.2	7.3	455.4	46.6

35-101

Page 5.4-6, Paragraphs 3 and 4

Indirect power grid and incremental refinery emissions are discussed as being associated with operation of the Pacific Pipeline. Similar emissions would be associated with the Cajon Pipeline as well as all of the alternatives. Indirect emissions should be, but are not, discussed with respect to the Cajon Pipeline and the other alternatives. 35-102

NOISE

Chapter 4.8 Affected Environment

Section 4.5 Noise
Page 4.5-4, Second Full Paragraph, Lines 3-4, and Tables 4.5.1-3 & 4.5.1-4

Reference is made to noise measurements being made "to verify published information". However, the measurements in Table 4.5.1-3 are in general inconsistent with the "estimated ambient noise levels" indicated in Table 4.5.1-4. These discrepancies are not explained or even acknowledged. 35-103

Page 4.5-6 thru 4.5-8, Table 4.5.1-4

The "residential" receptors are not adequately identified: there is no indication of whether a single resident or several hundred would be affected. 35-104

The list of sensitive noise receptors is incomplete. For example, South El Monte should be listed, with Continuation School being identified as the sensitive receptor located within 100 feet of construction. This information comes from the Land Use Table 4.7.1-1, at Page 4.7-6. Also, two churches in Montebello are not listed. 35-105

22

RESPONSE TO LETTER 35:

35-102 Potential indirect emissions associated with Cajon Pipeline will occur due to refinery operation and heater power requirements. Refinery and heater operations will not change from present conditions as explained in response to Comments 32-5 and 44-5.

35-103 Table 4.5.1-2 and Table 4.5.1-3 are consistent. The pipeline route till M.P. 80 is primarily within partially developed rural setting and a low density suburban environment which is anticipated to have an average noise level of 40 dBA to 55 dBA. Noise monitoring indicated that the urban areas of Adelanto have an noise level of 42 to 61 dBA and the National Forest to have noise levels of 41.7 dBA. The remainder of the route is within urban environments which are noisy to very noisy. On-site monitoring was used to calibrate the estimated ambient noise levels.

35-104 Residential in all cases in Table 4.5.1-4 refers to a residential neighborhood areas, be they single-family or multi-family dwellings. It is not necessary to enumerate the number of people which would be affected.

35-105 These corrections have been made to Table 4.5.1-4.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

Chapter 5.0 Environmental Consequences

Section 5.5 Noise
Page 5.5-1, Paragraph 2, Standards of Significance

The first two standards of significance are inadequate because there is no definition as to what constitutes a "substantial" increase. Without such a definition, these standards are meaningless. 35-106

Page 5.5-3 Paragraph 1

The analysis of construction noise impacts on sensitive receptors is incomplete. The number and location of receptors are only partially listed in Section 4.5 and the duration of noise impacts is not estimated. 35-107

Page 5.5-4, Paragraph Under Impact 5.5.1-2, and Last Paragraph (M70 Pipeline) and Page 5.5-5 First Full Paragraph (Pacific Pipeline)

The Cajon Pipeline construction noise impacts would be very similar to those described in the EIR for the M-70 and the Pacific Pipeline PEA. While both the M-70 and the Pacific Pipeline documents considered these noise impacts as "significant" (before mitigation), the Cajon analysis considers them "less than significant." Comparative evaluation of alternatives is completely invalid if different significance standards are employed for different alternatives. Additionally, this analysis fails to acknowledge that as per the Pacific Pipeline PEA, noise impacts due to construction will be mitigated to less-than-significant levels. 35-108

Page 5.5-5, First Full Paragraph, Lines 4-5

While quantification of the number of impacted sensitive receptors would be a reasonable means for comparing the Pacific Pipeline to the Cajon Pipeline, there is no equivalent quantification of impacted receptors for the proposed Cajon project (or for M-70). Consequently, the quantification of the Pacific Pipeline serves only to over-emphasize and thereby misrepresent noise effects for Pacific Pipeline. 35-109

VISUAL RESOURCES

Chapter 4.0 Affected Environment

Section 4.6 Visual Resources
Page 4.6-5, Paragraph 5, Lines 2-7

The discussion indicates high desert areas are of "low visual sensitivity. . . [d]ue to distance from primary travel routes." This statement is inaccurate because the first 40 miles of the proposed route are almost entirely in "foreground" viewing distances less than 0.25 mile from State Highway 58 and U.S. 395. 35-110

General Comments on Section 4.6 Visual Resources

There is a very limited discussion of areas of visual sensitivity south of Cajon Pass except to acknowledge that route is on visually prominent slopes between Cajon and Lytle Creek, and that Whittier Narrows area is considered visually sensitive.

There is only a very limited identification of key observation points. 35-111

23

RESPONSE TO LETTER 35:

35-106 The definition of "substantial" is dependent upon the existing noise environment. A quiet residential neighborhood would be significantly affected by the operation of noisy industrial equipment, however an industrial neighborhood would not. The compatibility of operations is thus defined in relation to the ambient noise level of the surrounding land use.

35-107 Table 4.5.1-4 has been revised to include all known sensitive receptors.

35-108 Construction noise levels had been identified as a less-than-significant impact, due to their short duration. The statement has been revised to reflect that for the duration of construction the impact would be significant.

35-109 Discussion of the number of sensitive receptors has been removed from the discussion on page 5.5-5 of the Final EIS/EIR.

35-110 Yes, the pipeline would be constructed approximately 0.25 miles from State Highway 58 and U.S. 395. Yet most ground disturbance is difficult to see in the desert environment from the same plain. View sheds that include approaches to areas which rise above the highway may make the pipeline right-of-way visible in the short term until vegetation has been reestablished, such as within the Kramer Hills.

35-111 From M.P. 74 to M.P. 142, south of Cajon Pass, the pipeline is to be constructed entirely within road rights-of-way and flood control channels. The pipeline will be below ground. It does not disturb any visually sensitive areas within this urban environment. Extensive description of visual resources was not required. Key observation photos are demonstrated on the Route Maps within Appendix A.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

Chapter 5.0 Environmental Consequences

Section 5.6 Visual Resources
Page 5.6-1, Paragraph 2, Standards of Significance, First, Third and Fourth Bullet Items

Significance standards need to be specific enough that most evaluators working independently would arrive at the same conclusion as to significance. "Substantial" change or degradation is open to broad interpretation and is unlikely to result in consistent interpretation. As such, it is not adequate as a significance standard. 35-112

Page 5.6-2, Paragraph Under Impact 5.6.1-1

Mitigation for the Cajon Terminal does not, but should, include screening of the substation and of the parking area since this could be considered a significant impact. 35-113

Page 5.6-2, Mitigation Measure 5.6.1-1(c)

"Considering" the reduction of the storage tank height does not constitute an adequate or lawful mitigation measure. 35-114

Page 5.6-2, Mitigation Measures, Concluding Line

It is difficult to imagine how 750,000 barrels of storage less than 0.25 miles from a primary travel route (CA 38) could be considered "less-than-significant" visually, even with a mitigating paint color, "mounded" containment berms and reduced tank heights. Five large tanks constructed in the middle of the desert would have to be considered visually significant even under the nebulous "substantial change" language of the standards employed. Further, while "mounded" containment berms mimicking natural land forms would be preferable to geometric forms, it would take decades for revegetation of the berms to approach a natural look in the desert environment. 35-115

Page 5.6-3, Mitigation Measure 5.6.1-2(a)

The potential for success of revegetation is overstated. See Figures 4.6.1-1, Photo B and 4.6.1-3, Photo F, showing the lack of success of revegetation for past pipeline projects. Was there any consideration of the fact that the AAFL was constructed across the desert approximately six years ago and revegetation of shrub cover is still virtually non-existent? 35-116

Page 5.6-3, Concluding Line Under Mitigation Measures 5.6.1-3 (a)-(c)

Similar to the preceding comment, it is difficult to imagine that the mitigation proposed would reduce a "significant" visual impact to "less-than-significant." A seventy-foot swath of cleared and graded pipeline right-of-way would be 7 to 9 times wider than any existing desert road. "Feasible" revegetation is unlikely to reduce the visual scar in our lifetime. 35-117

Page 5.6-4, Mitigation Measures 5.6.1-4(a)-(c)

What is "feasible"? Are there existing roads and cleared rights-of-way where they can be effectively used? If so, how wide are they? How steep are the side slopes? How wide will the clearing be to accommodate construction on steep slopes? What is "feasible" for recontouring? As with the preceding 35-118

RESPONSE TO LETTER 35:

35-112 A "significant effect on the environment" within CEQA is defined as a substantial, or potentially substantial, adverse change in the environment. Appendix G within the CEQA Guidelines forms the basis for the definition of Standards of Significance used within the EIS/EIR. In most cases, the definition of a standard is subjective. The EIS/EIR preparers have used the standards of significance even though not quantitative to identify any possible or potential impacts.

In this instance, the perception of visual impacts are very subjective. A "substantial" visual impact is dependent upon the impacts prominence, the visibility of such an impact, the surrounding landscape and the number of persons within the viewshed. Where the pipeline route is extremely visible and within an area of open landscape disturbance has been identified as significant.

35-113 In preliminary development of mitigation measures for this impact screening vegetation was suggested. However, review and discussions by the lead and cooperative agencies identified that screening vegetation in an environment in which the majority of the habitat and vegetation is less than three feet in height would be conspicuous, and result in secondary requirements for irrigation that would have significant impacts.

35-114 This mitigation measure has been reworded to require that a minimum height be utilized.

35-115 The construction of the Cajon Terminal is identified as a significant visual impact. However, the duration of view is important. Even though the tanks are still noticeable from a distance, a viewer is more likely to be travelling at speed across a vast area of broad uniform desert and the interruption of view will be short in duration. A compatible color selection with mounding would reduce the contrast of the built forms. It would be preferable that vegetation not grow on the containment berms due to fire hazards and access. A grass cover would be permitted.

COMMENT LETTER 35: PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

comments, there are too many unanswered questions for the assertion to be credible that the proposed mitigation measures would successfully reduce "significant" visual impacts to "less-than-significant" levels. 35-118

Although the Kramer Hills is indicated on Page 4.6-5 as an area of high visual sensitivity, this section does not address any mitigation for construction in the Kramer Hills area.

Page 5.6-4, Mitigation Measure 5.6.1-4 (a)

The identified mitigation measure regarding construction through the Cajon Pass does not address minimizing impacts resulting from the steepness of the slope. There is also no comment on the extent to which original contours may not be recreated. 35-119

Page 5.6-4, Impact 5.6.1-5 thru Mitigation Measure 5.6.1-5

This section regarding the mitigation for impact from construction from MP 67.0 to Carson fails to address mitigation in areas where the route is along flood control channels. It also fails to describe the types of vegetation found along flood control channels. The fact that the route will follow flood control channels is indicated by the following references in the DEIS/R:

-- Page 4.6-8, fourth full paragraph, states that from MP 80.0 to Carson the route is "in existing roadways, or along flood control channels, or utility or railroad right-of-ways."

-- Page 4.7-12, third full paragraph, states that the pipeline follows the San Jose Creek.

-- Page 4.7-13, paragraph 4, state that the route follows the Rio Hondo right-of-way in Downey.

-- Table 4.7.1-1 indicates that the route would be adjacent to flood control channels in LA County, Downey, South Gate, Paramount, Compton, and Long Beach. 35-120

Page 5.6-5, Impact 5.6.1-6 thru Mitigation Measures

The discussion of the mitigation of oil spills fails to address mitigating oil spills in urban areas. The potential success of revegetation of areas damaged by oil spills in the desert is also not evaluated. 35-121

Page 5.6-5, Kramer Segment Alternative Paragraph

In contrast to information presented in the text, it would appear that the slopes are steeper and thus more difficult to reclaim on the Kramer Segment Alternative. What would be the alternative-specific mitigation measures? 35-122

Page 5.6-5, Sycamore South Segment Alternative Paragraph

The discussion of the Sycamore South Segment Alternative ignores impacts to the Glen Helen Regional Park through which the Pipeline would pass. (See page 4.7-14.) 35-123

General Comments on Section 5.6 Visual Resources

In addition to the significant omissions noted above, the DEIS/R fails to include any discussion of impacts relating to light and glare, visual impacts at stream crossing, and visual impacts of using areas adjacent to pipeline for temporary construction storage, access and general construction activities. Further, 35-124

25

RESPONSE TO LETTER 35:

35-116 At the 12-Gauge pump/heater station the right-of-way for the All American is difficult to distinguish from the surrounding natural desert vegetation. Unfortunately the disturbance from the construction of the All American remained quite visible in this area owing to 7 years of drought that followed construction. Furthermore, the commentor may not be aware of recent revegetation that has occurred in the same area following construction of the Kern-Mojave gas pipeline in 1991, which parallels the All American. Six months following construction of that pipeline the right-of-way was highly visible with only little grass regrowth. However following the small rains which occurred in November, 1991, through February, 1992, significant regrowth occurred. Even small creosote bushes have reestablished themselves within the right-of-way. The success of the revegetation program established for that pipeline occurred even with very little rains.

35-117 See response to Comment 35-116.

35-118 Mitigation measure 5.6.1-4 (a) has been reworded to further define the requirements of construction through the Cajon Pass which have been agreed to by Cajon Pipeline Company.

5.6.1-4(a) *Construction activities and landform alterations on all mountain slopes shall be restricted to the existing Baldy Mesa Road from M.P. 55 to M.P. 63. Construction between M.P. 59 and M.P. 60 shall be restricted to a graded swath of 50 feet from the existing cleared right-of-way of the CalNev gas pipeline.*

Mitigation measure 5.6.1-4(b) addresses grades lopes in the Kramer Hills. Mitigation measures 5.6.1-4(c) refers to construction at stream crossings and is discussed in Section 5.2. Mitigation measure 5.6.1-4(d) is specific to construction within the forest service boundary and was worded specifically to address concerns of the U.S. Forest Service.

35-119 The impact addresses the visual prominence of these steep slopes from the major travel route. It is not necessary to mitigate construction impacts due to the steepness of the slope within the Visual Resources section. These are addressed in Impact 5.1.1-2.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

the DEIS/R omits any discussion of impacts and mitigation of such impacts on visually prominent slopes between Cajon and Lytle Creek (as noted on page 4.6-8) and on visually sensitive Whittier Narrows area (as noted on page 4.6-8). Finally, the DEIS/R makes numerous questionable assumptions about the likely effectiveness of mitigation measures, especially in desert areas.

LAND USE

Chapter 4.0 Affected Environment

Section 4.7 Land Use
Page 4.7-7, Table 4.7.1-1

There are numerous discrepancies between the text on pages 4.7-3 thru 4.7-14 and Table 4.7.1-1; also, the table is incomplete. For example: 1) Fontana, which is discussed at Page 4.7-11, is not included in the table; 2) The general use descriptions in the table are incomplete, e.g., commercial and light industrial is not included for Rancho Cucamonga; 3) Residential use is not included as a sensitive use (e.g., for Adelanto, San Bernardino County, Ontario and others); and 4) The distance of residential uses from the pipeline right-of-way is frequently omitted. 35-125

There also are many discrepancies between Table 4.7.1-1 and Table 4.5.1-4 (page 4.5-6) with respect to sensitive receptors. For example, Noise Table 4.5.1-4 identifies, with respect to Ontario, residential at 100 feet as a sensitive receptor; Table 4.7.1-1 however does not include this as a sensitive use. Moreover, the comments in the requirements column of Table 4.7.1-1 indicates that pipelines are prohibited within 150 feet of residential use. Therefore, the entry in Table 4.5.1-4 of a residential use at 100 feet is an inconsistency that must be explained. In total there are over 20 discrepancies.

What is the rationale for omitting flood control as a sensitive land use for Los Angeles County? 35-126

Page 4.7-9, Figure 4.7.1-1 (B)

Although Figure 4.7.1-1(B) includes Compton and Carson as cities traversed by the Cajon Pipeline, the map does not accurately reflect those facts. The map also does not illustrate the alternative routes. It also does not identify areas of Forest Service, BLM, or Air Force Lands. 35-127

Page 4.7-12, Fourth Full Paragraph

The Los Angeles County flood control areas, spreading grounds, and Significant Ecological Areas (SEAS) designated in the general plan at the Whittier Narrows and other areas should be designated as sensitive uses. 35-128

Page 4.7-14, Paragraphs 5-6

The descriptions of the Kramer and Sycamore South Alternatives are too general and do not describe land use jurisdictions crossed and existing or planned land use plans for these areas. 35-129

General Comments on Section 4.7 Land Use

The Affected Environment, Land Use section fails to discuss the project's conformance or nonconformance with existing land use plans and planned future land uses along the route. The ownership of 35-130

26

RESPONSE TO LETTER 35:

Original contours of the slope would not be disturbed. Topography would be altered at the toe and top of the slope to allow placement of construction equipment, but would be revegetated and returned to approximate the original contours as described in Section 5.1. This has been clarified in the discussion of Impact 5.6.1-4.

35-120 Construction within flood control channels will occur in the levee of the channel. It would not result in any visual impacts to the flood control channels. Vegetation along stream channels is discussed in Section 4.3.

35-121 The Oil Spill Contingency Plan would apply to the total length of 142 miles of pipeline. The mitigation measures are to be applied for any oil spill which may occur at any location along the pipeline not urban or sensitive areas alone.

35-122 The Kramer segment alternative does not cross any steep slopes. Steep slopes occur in the Kramer Hills on the Cajon Pipeline route.

35-123 Impacts to the Glen Helen Regional Park have been included within the discussion of the Sycamore South Alternative. Refer to Section 5.6.3 of the Final EIS/EIR.

35-124 An impact discussing light and glare has been included within Section 5.6. Visual impacts at stream crossings and construction storage are address in Impact 5.6.1-2. Discussion of visually prominent slopes is addressed in Impact 5.6.1-4. Impacts to visually sensitive locations within the urban areas has been included within Impact 5.6.1-5. The majority of the commentors concerns regarding effectiveness of mitigation measures relates to the effectiveness of revegetation. This concern is addressed in response to Comment 35-116.

35-125 Fontana has been included within Table 4.7.1-1. Commercial and light industrial uses for Rancho Cucamonga have been included within Table 4.7.1-1. Residential sensitive uses and distance from the pipeline which are within 1,500 feet of the pipeline have been included in Table 4.7.1-1 where appropriate. The inconsistencies between Table 4.7.1-1 and 4.5.1-4 have been corrected.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

the pipeline corridor is not summarized and thus any right-of-way issues cannot be evaluated, such as what part of the route is publically versus privately owned. Also, although the pipeline appear to pass through Riverside County for a short distance, the DEIS/R fails to address Land Use in Riverside County. 35-130

The DEIS/R does not address land use compatibility of the crude oil pipeline with flood control and/or groundwater recharge areas. Are these sensitive areas covered by land use plans of any jurisdictions that are crossed. Also, the construction of the pipeline in a wildlife area such as the Whittier Narrows Recreation Area could have significant impacts.

Chapter 5.0 Environmental Consequences

Section 5.7 Land Use

Page 5.7-1, Paragraph 1, Standards of Significance

The discussion of the standards of significance omits mention of the disruption of commercial, industrial, and agricultural uses. 35-131

Page 5.7-1, Impact 6.6.1-1 and Following Paragraph

The impact statement says that the Cajon Terminal and Adelanto pump station would occupy 27.2 acres of land. However, the text below the heading indicates that the Cajon Terminal is 2.2 acres and Adelanto is 6 acres. The heading and text thus do not match; there is a discrepancy of 19 acres. Also, both the heading and the text are inconsistent with the discussion at page 4.6-5, which states that the Cajon Terminal is 25 acres and Adelanto is 2.2 acres. 35-132

Page 5.7-2, First Full Paragraph

No mention is made in discussing this impact as to disruptions to sensitive land use areas of the flood control channels or SEAs. 35-133

Page 5.7-2, Impact 5.7.1-4 and Following Paragraph

The discussion of construction in developed areas fails to address mitigation of disruptions of business, commercial, and industrial uses, as well as the mitigation of the obstructions of access to these uses. The magnitude of the noted disruptions is not quantified and the impacts are not assessed. 35-134

General Comments on Section 5.7 Land Use

There is no discussion of impacts and mitigation of impacts of construction on undeveloped recreational and agricultural areas, and on schools, churches, hospitals and businesses.

The Cajon Pipeline may be determined to be incompatible with land use plans for flood control channels which would be a significant impact and difficult to mitigate for the 35 miles of such channels that the pipeline will be built in. 35-135

RESPONSE TO LETTER 35:

35-126 Sensitive receptors are defined to include schools, residential areas and hospitals. Sensitive uses are defined to include land uses which contain these sensitive receptors. Flood control facilities are not considered sensitive to the construction of a pipeline nor for normal operations. In the event of an oil spill, water resources could be affected. Mitigation measures have been included to reduce the probability of a spill and to specify spill containment procedures.

35-127 Figure 4.7.1-1 has been revised to illustrate boundaries of additional jurisdictions and to correctly show that it passes through both Compton and Carson. The segment alternatives have been included on this figure.

35-128 This has been included in Section 4.7.

35-129 Jurisdictions of the segment alternative have been included within the description of land uses for the Kramer Segment Alternative and the Sycamore South Alternative.

35-130 Early consultation and the public review process has provided an opportunity for all cities along the route to comment on consistencies with local policies and ordinances. Cities have responded with information on local plans and policies. In addition, mitigation measure 5.8.1-1(b) has been included to ensure that local jurisdiction and agencies are contacted and coordinated with to ensure consistency. Ownership is not an environmental issue. The pipeline does not pass through Riverside County. The commentor does not indicate where this reference was made so no response can be provided. The designation of sensitive uses is discussed in response to Comment 35-128.

35-131 The standards of significance have been revised to include disruption of commercial, industrial and agricultural uses.

35-132 The Cajon Terminal would occupy an area of 25 acres and the Adelanto Pump Station an area of 2.2 acres. This has been corrected in the discussion of Impact 5.7.1-1 and page 4.6-5.

35-133 Refer to response to Comment 35-128.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

UTILITIES/ENERGY USE

Chapter 4.0 Affected Environment

Section 4.8 Utilities
Page 4.8-1, Paragraph 6

The DEIS/R states the pipeline would be located within designated BLM utility corridors, but does not discuss where the pipeline diverges from utility corridor P, as shown on Figure 4.8.1-1. 35-136

Page 4.8-8, Paragraph 1 (Top of Page)

This discussion states that from M.P. 36-47 the pipeline is within an approved utility corridor of the City of Adelanto. Figure 4.8.1-1 shows the pipeline outside of utility corridors in the Adelanto area. Please explain and correct this inconsistency.

The DEIS/R does not address utility corridors for Los Angeles County or San Bernardino County. The possibility of locating the Cajon Pipeline in existing utility corridors should be addressed. 35-137

Page 4.8-8, Kramer Segment Alternative Paragraph

The discussion of the Kramer Segment Alternative fails to clearly indicate whether any utilities are located along this segment. Also, the Kramer Segment Alternative is not shown on Figure 4.8.1-1. 35-138

Pages 4.8-1 thru 4.8-8

The discussion of impacts to utilities should, but does not, address the following issues: Does the Cajon Pipeline follow designated corridors into the Cajon Pass area? Is there room in this corridor to provide space for Cajon? Would Cajon precempt other utilities planned for the Cajon Pass Corridor? How often would the pipeline cross other utilities? What types of impacts would be associated with crossing other utilities? What are implications for Cajon Pipeline if USFS management requires alternatives for Cajon Pass? 35-139

Chapter 5.0 Environmental Consequences

Section 5.8 Utilities
Page 5.8-1, Mitigation Measure 5.8.1-1

The identified mitigation for potential disruption of utility services does not address how actual disruptions would be handled. 35-140

Page 5.8-3, Mitigation Measure 5.8.1-3

The potential conflicts of the Cajon Pipeline with other utilities are identified; however, the key mitigation appears to be to simply require the BLM and the Forest Service to resolve such disputes. This does not, however, demonstrate that the disputes can or will be resolved, and is not a lawful or adequate mitigation measure. (Sundstrom v. County of Mendocino (1st Dist. 1988) 202 Cal.App.3d 813.) This is especially important given that the Cajon Pass area has been an area of conflicting demands by utility projects for a number of years. 35-141

28

RESPONSE TO LETTER 35:

35-134 Impacts due to disruptions of business, commercial, and industrial uses relate to the impacts to access. This disruption shall be short in duration and provided access is maintained no significant impacts would occur to the land use. Maintenance of access in addressed in Mitigation Measure 5.10.1-1 (d) and 5.7.1-4 (c).

35-135 Construction impacts to these uses are addressed in relevant physical environment sections, such as noise, transportation, and water resources.

35-136 Utility corridor "P" as designated by the BLM on public lands is two miles wide. The extent of the corridor contains the proposed route on federal lands. The pipeline route was not correctly shown in Figure 4.8.1-1. This has been corrected.

35-137 See response to Comment 35-136.

35-138 No utilities are presently located from M.P. 0 to M.P. 13.0 of the Kramer Segment alternative. For the remainder of the alternative route, utilities are as described for the Cajon Pipeline. This alternative has been included in Figure 4.8.1-1.

35-139 The Cajon Pipeline would follow a utility corridor designated by the USFS on forest system lands in the Cajon Pass area. The impacts of the proposed pipeline on the existing utility corridor of the Cajon Pass are addressed in Section 5.8.

35-140 Mitigation measures attempt to ensure that utility lines will not be affected by construction through identification of line placement. However, due to the lack of detailed location information for some lines, a mitigation measure pertaining to management of disruption of services has been included.

5.8.1-1(d) *A list of contact names and telephones for each agency and utility company whose lines will be crossed will be kept with the construction supervisor for that street crew. Representatives of utility agencies and companies shall be requested to be onsite on the day that utilities under their jurisdiction or ownership are being crossed.*

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

Page 5.8-3, Section 5.8.3

It is unclear whether the proposed route or the Sycamore South Alternative follows the Cajon Pass utility corridor. No map of this corridor and existing utilities is provided in the DEIS/R. 35-142

General Comments on Section 5.8 Utilities

Energy consumption required to pump and heat 180,000 BPD for the total pipeline system, including AAPL and the Cajon Pipeline, was not evaluated. These energy requirements and associated indirect air quality impacts are an important part of the environmental analysis. 35-143

SOCIOECONOMICS

Chapter 4.0 Affected Environment

Section 4.9 Existing Socioeconomics
Page 4.9-2, Paragraph 3

The discussion of Table 4.9.1-3 refers incorrectly to "Riverside/Los Angeles" MSA. The proper reference is to "Los Angeles/Long Beach MSA." 35-144

Page 4.9-2, Paragraph 4

Assessed valuation would be the most direct way to address fiscal effects of the pipeline, rather than the indirect dependent variable tax revenue which is addressed. 35-145

Page 4.9-4, Table 4.9.1-2

The study area share of Los Angeles County is computed incorrectly. For example, 1987 employment totals 733,950 and 16.8%, not 664,024 and 15%. 35-146

Page 4.9-4, Table 4.9.1-4

The 1987 Los Angeles County population is computed incorrectly. It should be 1,610,001, not 1,598,625. 35-147

Page 4.9-7, Table 4.9.1-5

The Table fails to include information on temporary housing. Such an omission is noteworthy in the context of a pipeline project, which has a fast moving, transient construction crew and almost no permanent employment. Will construction workers commute 100 miles each way or will they camp in the desert? 35-148

Pages 4.9-9 thru 4.9-12 (Pacific Pipeline)

The discussion of the Pacific Pipeline omits data provided in the Pacific Pipeline PEA on assessed values and temporary housing. Because temporary housing is a particularly important issue, the information should be included. 35-149

29

RESPONSE TO LETTER 35:

5.8.1-1(e) *In the event a utility is interrupted the agency or company whose service has been disrupted shall be contacted immediately. All construction work shall cease until service has been resumed.*

35-141 This mitigation measure was prompted by U.S. Forest Service concerns regarding the resolution of disputes that arise through complaints by past utility owners. It seeks to define the agency which has jurisdiction and ultimate authority over the use of the utility corridor. The commentor should be aware that the U.S. Government's permits for almost all uses of federal lands are non-possessory and non-exclusive.

35-142 The Sycamore South alternative follows an existing utility corridor.

35-143 Refer to response to Comment 44-27.

35-144 This reference has been corrected.

35-145 The EIS/EIR estimates assessed valuation of the proposed project and estimates the incremental increase in assessed property tax revenues.

35-146 This has been corrected in Table 4.9.1-2.

35-147 This has been corrected in Table 4.9.1-4.

35-148 The need for temporary housing is addressed in Impact 5.9.1-2.

35-149 The impacts of temporary housing is addressed in Section 5.9.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

General Comments on Section 4.9 Existing Socioeconomics

The data presented in the tables in this section are 1987 data, from the Southern California Association of Governments. More recent data are available, e.g., 1990 census data for population, CA Department of Finance for 1991 housing units, and LA Employment Development Department for 1990 employment data. Also, 2010 projections are highly speculative and essentially irrelevant to the proposed project which is scheduled for 1993 construction if approved. 35-150

Also, no data were presented for wage/income structure for the study area. 35-151

The DEIS/R fails to discuss local businesses that may be impacted by construction. 35-152

Chapter 5.0 Environmental Consequences

Section 5.9 Socioeconomics
Page 5.9-3, Impact 5.9.1-3 and Following Paragraph

The estimates of 140 workers for a period of 60-70 days, 9 workers in Adelanto for 6 months and 23 workers at Cajon Terminal for 8 months is inconsistent with the information noted in the impact section 5.9.1-1 and Table 5.9.1-1. These estimates are also inconsistent with the statements on Page 3-25, Paragraph 3, that the total expected work force during construction will be 127 persons. 35-153

The discussion states that adequate temporary accommodations would be expected to be available, but there is no analysis of existing temporary housing and vacancy rates. 35-154

Page 5.9-4, Impact 5.9.1-3 and Following Paragraph

There is no discussion of the rationale for the conclusion that the most affected public service would be police. For example, why not the Fire Department? 35-155

Page 5.9-9, Impact 5.9.1-8 and Following Paragraph

The DEIS/R fails to discuss the economic impacts of the temporary disruption of business, commercial, industrial activities that would be caused by construction or oil spills. 35-156

Page 5.9-10, Impact 5.9.1-10 and Following Paragraph

How would the project ensure that the construction work force will commute from their homes rather than camp out in the desert? 35-157

Page 5.9-10, Impact 5.9.1-11 and Following Paragraph

There is no basis presented for concluding that the most affected public service would be police. 35-158

Page 5.9-11, Impact 5.9.1-13 and Following Paragraphs

This section fails to address the economic impact of disruption of business activities caused by construction. 35-159

30

RESPONSE TO LETTER 35:

35-150 At the time of compilation of information for this document, 1990 census data was not available.

35-151 Implementation of the proposed project will result in the creation of 30 permanent jobs. Wage/income structure are not relevant to the socioeconomics impacts which are to be addressed.

35-152 Impacts to local business due to construction would result from the lack of access. Impacts to access are addressed in Section 5.10.

35-153 The total work force is anticipated to be 227 persons. The project description has been corrected to reflect this work force estimate.

35-154 Approximately 32 workers may require temporary housing in the High desert. Housing could more than adequately be provided in the desert communities, especially as a result of the recent closing of George AFB, east of Adelanto. The Los Angeles basin areas provides a number of locations and accommodations for the estimated 140 workers which would need temporary housing.

35-155 It is assumed that 75 percent of the construction workers would be non-local hires. Temporary housing which these additional workers would use already exist within the cities in which they would choose to live. This increase in population would affect population based services rather than housing stock based services, such as fire services.

35-156 Construction impacts which would result in a disruption to business are related to the provision and interruption of access. An oil spill adjacent to business and commercial areas could also result in disruption of access. These impacts are addressed in Impact 5.9.1-13 and also Section 5.10.

35-157 Camping in the desert on public lands under the jurisdiction of the BLM is only permitted in designated areas and with certain time restrictions under BLM regulations. Offenders would be notified and/or cited by BLM law enforcement Rangers.

35-158 Refer to response to Comment 35-155.

35-159 Refer to response to Comment 35-156.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

General Comments on Section 5.9 Socioeconomics

Additional significant deficiencies include:

- Lack of information regarding the project's contribution to local tax base resulting from property improvements.
- Lack of information on the adequacy of existing public service, i.e., police, fire, medical, schools, from which to judge whether the project would have an impact.
- Failure to address, for any of the cities or counties, the emergency response capabilities for responding to an oil spill or construction accidents.
- Failure to address components 4 and 5 of the general approach identified on page 5.9-2.

35-160

TRANSPORTATION AND CIRCULATION

Chapter 4.0 Affected Environment

Section 4.10 Transportation and Circulation
Pages 4.10-3 thru 4.10-8, Tables 4.10.1-1 and 4.10.1-3

Despite citing almost 80 potentially affected streets on Table 4.10.1-1, data are provided for only 10 streets on Table 4.10.1-3. Many other affected streets are not even included in the 80.

Examples of errors in Table 4.10.1-1 include: 1.5 miles of Peck Road parallel to the pipeline at M.P. 119.5, but the pipeline actually crosses Peck Road at M.P. 120; Washington Boulevard is crossed by the pipeline at M.P. 126 but is not listed. Other streets crossed or parallelled but not listed include: Telegraph Road, Guatemala Avenue, Sunn Street, Rio Hondo Drive, Garfield Avenue, Century Freeway (scheduled for completion in 1993), Somerset Boulevard, and Alondra Boulevard between M.P. 126 to 135.

35-161

Page 4.10-6, Table 4.10.1-3

"Mid-block" level of service ("LOS") is of minimal relevance in an urban area where the key consideration is typically peak hour traffic at intersections. This is especially crucial if construction will occur during peak hours. If construction is to occur mainly off-peak, however, hourly traffic for the off-peak period should be evaluated. In either case, the analysis is not sufficient.

35-162

On streets where lane closures would occur, lane capacity with and without the project should be provided to permit analysis of traffic effects with fewer lanes open.

35-163

Pages 4.10-1 thru 4.10-10

No information is provided for the pipeline branch to the Hynes Terminal which is located along 60th Street for about 2 miles, and which crosses numerous streets. No information is provided on rail traffic for the affected lines crossed or paralleled by the pipeline. The alternative route discussion does not list transportation features crossed by the Kramer or Sycamore South segments.

Information for public transit in the project vicinity is not, but should be, provided.

35-164

RESPONSE TO LETTER 35:

35-160 Comments regarding local tax base are addressed in response to Comment 35-145. Comments regarding impact to public services are addressed in response to Comment 35-155. Impacts to emergency response capabilities are addressed in Section 5.12. Components 4 and 5 are addressed in Impact 5.9.1-7 and Section 5.10..

35-161 Additional street crossings have been added to Table 4.10.1-1 per specific comments. Baseline information was added for major street crossings. In order to be concise and on the understanding that impacts to all roadways would be significant and would require coordination with the respective jurisdiction it was not deemed necessary to include traffic conditions for all streets.

35-162 Refer to response to Comment 35-161.

35-163 Refer to response to Comment 35-161.

35-164 The Hynes branch road crossings have been added to Table 4.10.1-1. All rail crossings would be bored and would not in any way impact rail traffic at rail crossings. The Kramer segment alternative for the 13 mile deviation from the proposed Cajon pipeline route follows dirt roads in the desert. The Sycamore South segment alternative deviates for 2 miles and would result in additional 2 crossing of the I-15.

In the their evaluation of potential impacts, impacts to transit were considered temporary. Coordination will be undertaken with appropriate transit authorities to ensure uninterrupted service. This has been incorporated into Mitigation Measure 5.10.1.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

Pages 4.10-10 thru 4.10-17

Substantial amounts of data are provided for transportation conditions for both the M-70 and Pacific Pipelines in their respective EIR and PEA to permit reasonable analyses of project effects. Much of this information is left out of the Cajon DEIS/R and comparable data are simply not provided for the Proposed Project. 35-165

General Comments on Section 4.10 Transportation and Circulation

Transportation data provided for the Cajon Pipeline are insufficient to support the level of analysis needed to reasonably determine the effects of a major pipeline construction effort in urban streets. 35-166

Chapter 5.0 Environmental Consequences

Section 5.10 Transportation
Page 5.10-1, Paragraph 2, Line 3

The pace of urban construction is noted here as 0.5 mile per day. This is inconsistent with the 0.25 mile per day pace cited on Page 3-25, Paragraph 5. What is the accurate estimate? 35-167

Page 5.10-1, Paragraph 3, Lines 4-5

This section states that two-way traffic would be maintained at all times. This is inconsistent with Mitigation Measure 5.10.1-1(b) which states that only one lane will be left open. What will actually be done? 35-168

Page 5.10-1, Paragraph 4, Lines 1-2

Table 4.10.1-1 indicates that, while some crossings will be bored, many more will employ open trench construction techniques. Which method is proposed? Which method was analyzed? Trenching in streets has the potential to cause serious problems for traffic and emergency access. 35-169

Page 5.10-2, Second Bullet Item

The 30-60 minute delays on arterials in the L.A. Basin are not likely to be acceptable. Evaluation of alternate traffic routing and potential effects on such streets may be needed. How will impacts be mitigated to insignificant levels? 35-170

Page 5.10-3, Second Full Paragraph

According to Table 4.10.1-1, a total of 12 separate streets would be paralleled between M.P. 107.4 and 117. However, only 2 streets are listed in this paragraph, Business Parkway and Fairway Drive. The number of lanes, traffic counts and other information required to determine impacts are not available in the DEIS/R. 35-171

Page 5.10-3, Second Full Paragraph, Lines 6-7 and Fourth Full Paragraph, Lines 5-6

The assertion that there will be no significant adverse effect on access to properties or emergency response is not supported by the data or the analysis. Section 4.10 (page 4.10-2, Paragraph 1) notes "numerous commercial and residential driveways" in the urban area. Why and how will adverse effects be avoided? How is it known that effects would not be significant if no criteria have been established? 35-172

RESPONSE TO LETTER 35:

35-165 Conciseness and only information that was necessary to assess traffic impacts for the Cajon Pipeline directed what information was included. For consistency and to ensure that the document does not become cumbersome information that was relevant and comparable to what was required for Cajon Pipeline was included for the alternatives.

35-166 The impacts analysis for transportation identifies that construction with road rights-of-way would result in significant impacts. The exact requirements of each jurisdiction affected will be determined through coordination efforts when more detailed construction information is known. For this reason general characteristics for roadways was deemed sufficient if every roadway crossed is included in the discussion with even minor roads included the section would be come overly cumbersome and not aid in the definition of the traffic impacts.

35-167 Urban construction speeds are 0.25 miles per day. This has been revised.

35-168 On major streets two lanes shall be maintained whilst on minor streets one lane will be maintained. This has been clarified in the text on page 5.10-1.

35-169 Construction will utilize both trenching and boring as some crossing locations are suitable for one technique or the other. The construction spread requirements are described in Section 5.10. Locations which will require bored crossings are outlined in Table 4.10.1-1 and therefore it should be assumed that all other crossings will most likely be trenched.

35-170 A Transportation Management Element and Traffic Control Plan, as elements of the COM Plan, will be required for construction. If closures are required which in consultation with the affected jurisdiction impact access, cause significant delay, and affect emergency personnel, alternative routes shall be identified. Notification and coordination of emergency personnel is required within Mitigation Measure 5.10.1-1(e). Mitigation Measure 5.10.1-1(a) has been revised to clearly delineate the need for identification of alternative routes.

35-171 The paragraph has been revised to reference Table 4.10.1-1 which lists all of the streets that are paralleled by the pipeline between M.P. 107.4 and 117. The additional information is not deemed necessary for determination of traffic impacts.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

Page 5.10-3, Third Full Paragraph, Lines 2-3

How serious would the noted "peak hour congestion and delay" be? In many areas, peak hour congestion is already severe and any aggravation of the condition would be significant. 35-173

Page 5.10-4, Mitigation Measure 5.10.1-1(b)

This discussion should indicate what mitigation techniques will be applied to each affected road. As written, the mitigation measure is too general to allow meaningful assessment of impacts to specific roadways and of the effectiveness of the mitigation measure. 35-174

Page 5.10-4, Mitigation Measure 5.10.1-1(c)

Given that in some areas of the Los Angeles Basin peak periods extend longer, what is the basis for these off-peak construction periods? 35-175

Page 5.10-4, Impact 5.10.1-2 and Following Paragraph

Is it reasonable to allow workers to drive to the work site individually in urban areas? No mitigation is presented for parking of construction vehicles, delivery and transport trucks, and construction workers; is there a plan? Where are the staging areas for construction and what impacts would be expected from traffic to the storage and staging areas? What would the traffic impacts be from truck trips for disposal of excess fill, including contaminated soils? 35-176

General Comments on Section 5.10 Transportation

The analysis provided is insufficient to support the impact conclusions. Moreover, the proposed mitigation measures are not evaluated for effectiveness. 35-177

CULTURAL RESOURCES

Chapter 4.0 Affected Environment

Section 4.11 Cultural Resources
Page 4.11-1, Paragraph 1

The DEIS/R states that the cultural paleontological information was collected via a "resource reconnaissance survey." Because the EIS was prepared under BLM procedures, the data must be accumulated and examined in accordance with BLM procedures. BLM procedures do not provide for a reconnaissance survey. Rather, BLM manual 8100 Cultural Resource Management requires a Class III survey, which is an intensive pedestrian survey that may include subsurface testing. The resource reconnaissance survey that was conducted for the DEIS/R does not meet BLM requirements. 35-178

Page 4.11-1, Paragraph 3

The DEIS/R does not indicate the boundaries used for surveys across private and state lands. 35-179

RESPONSE TO LETTER 35:

35-172 Access shall be maintained by the placement of steel plates over driveways that are capable of temporarily supporting all vehicles that could need to cross. If access was prevented for more than an hour, without alternative access available, then significant impacts would occur.

35-173 Delays could be greater than 30 minutes if trenches were left open. However, Transportation Management Plans specified within the following mitigation measures specify that construction shall be conducted in off-peak hours.

35-174 This mitigation measure has been revised to require coordination with respective jurisdictions. Traffic impacts cannot be fully delineated as the location of the pipe placement within the road way requires coordination with the public works departments for each city and jurisdiction. The affected cities have commented on this mitigation measure and revisions have been incorporated into the text per their requests.

35-175 Peak commute periods were based on general hours for the entire 142-mile length. This time period has been revised per city requests.

35-176 Staging areas for construction will be located at 12-Gauge Lake, Adelanto and Fontana. The COM Plan would include directions for operation of staging areas and workers travel and parking within construction areas specified within the Transportation Management Plan. Mitigation measures requiring carpooling have been added to Mitigation Measure 5.10.1-2. Traffic impacts for trucks are assessed in Impact 5.10.1-2.

35-177 Specific comments that the commentor has provided have been addressed in the preceding responses.

35-178 The reconnaissance survey in this instance was an intensive pedestrian survey and did meet the BLM requirements. This has been clarified in the text.

35-179 The boundaries of the survey are as described on page 4.11-1. Different corridor widths centered on the right-of-way were used in different areas dependent upon the requirements of the different jurisdictions.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

Page 4.11-1, Paragraph 5 thru Page 4.11-3, Fifth Full Paragraph

This section describing the ethnographic background is, at best, superficial. For each of the ethnic groups, Gabrielino and Serrano, it fails to provide a complete description of the period in time that these groups occupied the area, the type of life that they led, the type of tools used in their daily life, etc. Without such information it is impossible to know what to look for and how to describe artifacts that might be found. 35-180

Page 4.11-5, First Full Paragraph

The discussion notes that there have been 42 studies along the Cajon Pipeline route and another 95 studies along the San Bernardino route. These studies should be listed specifically and summarized in order to allow the reader to evaluate the existing data base. 35-181

Page 4.11-5, Second Full Paragraph

The discussion in this paragraph is too general. Statements are made that there were 16 sites peripheral to the pipeline corridor--one historic, 15 with various types of prehistoric remains. The referenced sites should be identified specifically, and information should be provided as to the distance of the sites from the pipeline corridor and as to the types of prehistoric remains that occurred at each site. 35-182

Page 4.11-5, Third Full Paragraph

The discussion indicates that "only two prehistoric sites were identified near the right-of-way," but that "their presence is not representative of the use of the area." What does "not representative" mean? Why are these sites not potentially eligible for listing? The DEIS/R inappropriately suggests that the two sites are not eligible or considered of importance. Information should be included to substantiate such conclusions or it should be indicated that the sites are significant. 35-183

Page 4.11-5, Fourth Full Paragraph

The DEIS/R states that the list of 52 prehistoric sites was narrowed to reasonably reflect the proposed right-of-way. However, the DEIS/R fails to explain the basis upon which the list was narrowed, or the basis for the County's rating of "high" for prehistoric and historic resources. 35-184

Page 4.11-5, Fifth Full Paragraph

Because most archaeologists believe there are diagnostic values in lithic scatters, the DEIS/R should explain why it was concluded that the identified lithic scatters are of no importance. At the very least, mitigation must be presented for these sites. 35-185

Page 4.11-6, Paragraph 1

Although the discussion states that three trained archaeological surveyors spent ten days in the field, there is no discussion of what the surveyors did in the field, or how they approached this survey. Such information is needed in order to make the discussion meaningful. This discussion also fails to explain why the survey width varied. Further, the discussion reveals that the archeological reviews are incomplete since private and fenced properties were not investigated. Data must be obtained for the entire pipeline route, regardless of whether the property is private or public. 35-186

RESPONSE TO LETTER 35:

35-180 Extensive information could be provided on the life style of the different indian cultures. CEQA states that the "placement of highly technical and specialized analysis and data in the body of the EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR." More detailed information regarding indian tribes has been included in the technical report prepared for this document.

35-181 These studies are referenced to provide information on the degree of study which has already been undertaken for portions of the pipeline route. It is not necessary for determination of significance of impact to list the names of every study completed. The sites which have previously been identified and are potentially affected are addressed in this section.

35-182 More detailed information has been included within these sections for the benefit of the reader to clarify the status of these sites.

35-183 McKenna et al. applied the term "not representative" in a technical sense. The commentor should be aware that site specific technical information is not available for public review but is included in the technical report (which the BLM approved) with respect to this reference.

35-184 "Narrowed" in this instance means that prehistoric routes which fall within the designated pipeline right-of-way were identified as being impacted.

35-185 More detailed information regarding these lithic scatters has been included in this discussion.

35-186 Field survey methodology has been revised to include more detailed information on survey protocols used by the archaeologist in the field.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

Page 4.11-6, Paragraph 2

While there is a brief discussion of the survey, the guidelines for this survey are not described. It appears that the required BLM procedures were not used. Also, the discussion states that "for the most part" parallelling transects were used. The discussion does not indicate what was used when parallelling transects were not used. Further, the discussion should describe the spots checked; not just say spot checking was done. 35-187

Page 4.11-6, Paragraph 3

The DEIS/R must at least summarize the information that is in the technical appendices. Sites and isolates must be listed so that sites can be relocated and reassessed for current conditions. 35-188

Page 4.11-6, Paragraphs 4-5

The statements in these paragraphs fall significantly short of the necessary in-depth analysis of the archaeological resources. The 56 identified resources and their locations relative to the pipeline must be described. Further, the discussion omits information for lands other than BLM and Forest Service. 35-189

Page 4.11-18, Paragraphs 1-2

Based on the discussion of the Kramer and Sycamore South Segments, it is obvious that pedestrian surveys were not completed for these segments. The discussion of these segments lack any analysis, and provide inadequate descriptions. The DEIS/R must present the same level of information for these alternatives as is presented for the Proposed Project. 35-190

The DEIS/R also fails to discuss paleontological resources with respect to the alternatives. 35-191

Chapter 5.0 Environmental Consequences

Section 5.11 Cultural Resources
Page 5.11-1, Paragraph 2

Has a programmatic agreement been negotiated? If so, the discussion should include a summary of the contents of the agreement. While the discussion references Section 106 and the criteria for eligibility of properties to be listed on the National Register, the DEIS/R does not make any recommendations for eligibility for any of the sites. 35-192

Page 5.11-2, Impact 5.11.1-1 and Following Paragraphs

The discussion fails to present evidence that supports the conclusions that there will be no impacts or that impacts will be negligible. There is also no supporting data for the determinations that sites were insignificant and contained little potential to yield significant data.

No information is presented to support the conclusion that the 56 sites would not be impacted. Further, as to the 10 sites that are listed, there is no assessment of the impact to those sites or an indication of the status of the National Register eligibility of those sites. 35-192

The information presented is not consistent with the statement made on Page 4.11-5 in the last paragraph that "in addition to shallow surface deposits, areas within San Bernardino County are known to

RESPONSE TO LETTER 35:

35-187 Refer to response to Comment 35-186.

35-188 More detailed description for each archaeological resources identified has been included within this section.

35-189 An in-depth analysis was completed for this document and was summarized for conciseness. More detailed description of sites has been included in response to this commentor.

35-190 Sensitivity of paleontological resources are expected to be High for the Sycamore South alternative and for the Kramer South Alternative.

35-191 Of the sites within the ROW, only one site is considered eligible. More description of this site has been included in the Final EIS/EIR.

35-192 These 56 sites are not within the pipeline right-of-way or within the area of potential affect.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

reflect a high probability for buried deposits". Mitigation should provide for subsurface testing prior to preparation of the final EIS. Eligibility and required mitigation cannot be determined until subsurface testing is completed. 35-192

Page 5.11-3, First Full Paragraph, Lines 3-4

No information is presented to explain why spot monitoring has been recommended. 35-193

Page 5.11-3, Mitigation Measure 5.11.1-1(b)

There is no description of what is meant by "ensure adequate data recovery." There should be information provided as to which federal standards and procedures are to be used given that each federal agency has its own procedures concerning curation. There should also be information included regarding curation, such as where the artifacts would be curated. 35-194

Page 5.11-3, Last Sentence

There is no information presented to support the conclusion that the mitigation would reduce impacts to a less than significant level. 35-195

Page 5.11-4, Last Paragraph

The DEIS/R states that construction on the Kramer Alternative could impact two additional sites, but only recommends monitoring. It must be assumed that these two sites were identified only from the record search rather than an intensive pedestrian survey given that such a survey apparently was not conducted for the alternative. Therefore, the analysis is incomplete and inaccurate. Additionally, there is no identified mitigation, and thus apparently, no commitment to protect the resource. 35-196

Page 5.11-5, Paragraph 1

It is inadequate to merely state that there is no information for M.P. 73 -74 on the Sycamore South Alternative. Information must be provided that is comparable to the information presented for the proposed action. Without such information, an informed conclusion cannot be reached by a decisionmaker or by the reading public. 35-197

Page 5.11-5, Paragraph 3

The statement that Pacific construction would adversely effect four cultural resources is inaccurate. At no time has Pacific ever stated in any document that there would be an adverse effect to any cultural resource site after mitigation. 35-198

General Comments on Section 5.11 Cultural Resources

The DEIS/R also fails to present any comparison between the proposed action and each of the alternatives. Such comparisons, preferably presented in the form of tables, are necessary in order to allow adequate comparisons. 35-199

RESPONSE TO LETTER 35:

35-193 Spot monitoring refers to areas of sensitivity. Not all areas of the pipeline right-of-way were determined to be sensitive. Therefore, a full-time monitor was not recommended and the BLM agrees that a full-time monitor was not needed, given the sparse nature of the resources along this linear route.

35-194 Data recovery is a technical term used for Phase III/Class IV studies (mitigation). The level of investigation for data recovery can vary from proposal to proposal, based on the approach of the given archaeologist. Since no formal research design has been prepared to date (and there is only one site requiring data recovery), there is no detailed data to present in the EIS/EIR. Rather, the BLM will be reviewing the research design prior to any data recovery and all levels of investigation will be designed to "insure adequate data recovery" to address the analysis of this site and the mitigation of adverse impacts. Recovered artifacts would be curated at the San Bernardino County Museum.

35-195 Further description of these sites has been proved to more clearly support the mitigation proposed.

35-196 An intensive pedestrian survey was undertaken for this alternative. Detailed mitigations are not provided for alternatives as this is not necessarily required under CEQA or NEPA.

35-197 The Sycamore South Alternative was identified from field survey as the proposed route would result in significant geological impacts. The Sycamore South alternative follows an existing right-of-way that contains two pipelines and one transmission line. Ground disturbance has already occurred.

35-198 Information for the Pacific Pipeline was summarized from the Proponents Environment Assessment (PEA). The adverse impact is prior to implementation of mitigation measures.

35-199 The comparison of market alternatives is provided in Chapter 6.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

SYSTEM SAFETY

Chapter 4.0 Affected Environment

Section 4.12 System Safety and Reliability
Overall Comment

Chapter 4 of the DEIS/R contains no "Affected Environment" information relative to System Safety and Reliability. Two major categories of information are appropriate and should be provided in this section.

First, the historic experience of pipeline leaks and ruptures should be described in this section. Information on the causes of spills, rate and volume of spills, etc., as a function of certain pipeline characteristics such as size, and age, form the environmental setting or background from which the projected risk of the proposed project should be derived in the impact analysis section.

Second, there should be a description of the spill response and other emergency response capabilities, including contingency planning, available along the pipeline route. These baseline plans and capabilities form the environment into which the proposed project with its own risk mitigations will be placed. In particular, the fire fighting capabilities in the area of the pump stations and tank farm should be described in some detail. To state, as the DEIS/R does, that there is nothing to discuss in the environmental setting regarding system safety and reliability, is not acceptable. In particular, since the AAPL is an integral part of the Cajon system, both the historic spill (and response) experience of the AAPL, and the spill contingency planning and response capabilities for the AAPL, should be described in this Chapter. 35-200

Chapter 5.0 Environmental Consequences

Section 5.12 System Safety and Reliability
Page 5.12-2, Second and Third Full Paragraphs (Design and Construction)

The discussion states that a fire fighting plan will be provided which "will include involvement of local fire fighting capabilities." These capabilities, as mentioned in comment on Section 4, should be described in detail in the Affected Environment analysis of System Safety and Reliability. 35-201

The depth of pipeline burial is not designated and special requirements for pipelines in railroad or highway rights-of-way are not described. The burial is given as a range of depths and not clearly specified. 35-202

Page 5.12-15, Impact 5.12.1-1, Fourth Paragraph in Section

The last paragraph of this section states "Secondary impacts which would occur in the areas of soils, surface water, biological resources, air quality, visual resources, land use , socioeconomics, transportation and cultural resources are addressed in the relevant sections of Chapter 5." However, the risk analysis does not provide the probabilities and spill volumes necessary to complete these analyses. Additional questions need to be answered. What are the potential oil spill risks and volumes and potential impacts if the pipeline were to break at a sensitive stream, spreading ground, aquifer, or threatened or endangered species habitat? What would the oil spill volumes be at a major fault, landslide or high scour potential stream? What would the systems reaction time be and what volumes would be lost prior to valve closure? What if the power is interrupted to the motorized gate valve? What if the gate valve is not automated? 35-203

37

RESPONSE TO LETTER 35:

35-200 The risk of an oil spill is a property of the designed pipeline system and is characteristic of the environmental conditions. System safety is a characteristic of the environmental consequences of the proposed project. Pipeline leak incidence are addressed in Section 5.12. Permitted operations of the All-American Pipeline will not be affected by construction of the Cajon Pipeline. The safety of the AAPL was addressed in environmental documentation completed for permitting of the AAPL. It is not necessary to additionally address safety of the AAPL in this documentation, since no change to AAPL's facilities, other than a tap at 12-Gauge Lake, or authorized use is required.

The Oil Spill Contingency Plan (described in sections 3.2 and 5.12 of the Draft EIS/EIR) will establish procedures for emergency response, including designation of responsibilities and a listing of additional manpower and equipment which would be dispatched to the scene as part of standard response procedures. While in the event of a major rupture the respective jurisdiction's emergency response alone may not be adequate, the Oil Spill Contingency Plan will provide for the level of emergency response needed. The Oil Spill Contingency Plan will also document information on pre-approved response contractors.

35-201 It is assumed that the responsibility for response to an oil spill rests with the pipeline company. Local jurisdictions may be the first to respond but the OSC Plan must necessarily document and provide for the level of emergency response needed.

35-202 Detailed descriptions of construction techniques are provided in Chapter 3 and were not repeated in this section for conciseness. Normal pipeline construction, that is outside rock excavation, places lines at a minimum depth of 30 inches to 48 inches to the top of the pipe depending upon location. Specifics of pipeline depths are not known at this time, but all will meet or exceed State requirements.

35-203 The analysis for impacts in the event of an oil spill are addressed for each issue in Section 5. In each case the worst case is assumed, that is a spill of some magnitude occurs. The risk or incidence of spills is not the impact being addressed. The issue is what happens to the resources in the event of a spill, how could the impact to these resources be contained or reduced and what is the restoration or clean up procedure to be undertaken. Spill volume and incidence is addressed in Section 5.12.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

Page 5.12-16, Mitigation Measure 5.12.1-1(a)(iii)

There needs to be a definition of the phrase 'damage to an underground facility.' Also, what is a 'facility report?' There should further be an explanation of when construction would resume. 35-204

Page 5.12-16, Mitigation Measure 5.12.1-1(a)(iv)

Which fire departments would be called in the desert areas? Do all the local fire departments have the staff and equipment necessary for natural gas fires? How many natural gas lines are crossed or are within parallel corridors that potentially could be impacted? 35-205

Page 5.12-16, Mitigation Measure 5.12.1-1(b)(iii)

The DEIS/R should indicate how deep the pipeline will be buried at Cajon Wash, Etiwanda Creek, San Jose Creek, and Los Angeles River? Also, what will be done in terms of burial depth and pipeline protection at other creeks listed in Table 4.2.1-1, especially at San Gabriel River, Whittier Narrows, and Rio Hondo? 35-206

Page 5.12-16, Mitigation Measure 5.12.1-1(c)(i)

Additional information regarding this mitigation measure is needed. Specifically, how would the remote-controlled valves be signalled? Would there be back-up communications? How will the motor-operated valves be closed if there is a power failure? Where are the manual gate valves, and how would they be closed in an emergency? 35-207

Page 5.12-17, Mitigation Measure 5.12.1-1(d)(i)

The DEIS/R' description of the OSC Plan is incomplete. How effective will the OSC Plan be in urban areas? How will oil be kept out of major waterways, such as Cajon Creek, Lytle Creek, San Gabriel River, Rio Hondo, San Jose Creek and Los Angeles River? Does the plan address San Pedro Bay? How will the plan address situations such as shown in Figure 4.6.1-5, Photo 1 of this report? 35-208

Page 5.12-18, Mitigation Measure 5.12.1-1(d)(vii)

Will the on-site drainage and collection systems be placed along the route other than at Old Cajon Boulevard (MP 72)? 35-209

Page 5.12-18, Third Bullet Item

How will the oil spill clean-up plan at river crossings address public water supplies, infiltration basins, spreading grounds and sensitive aquifers? 35-210

Page 5.12-18, Fourth Bullet Item

Will revegetation after oil spills be successful in the delicate washes, such as Cajon Wash and Lytle Creek? Does the plan address the threatened and endangered species in Cajon Wash or downstream in the Santa Ana River? 35-211

RESPONSE TO LETTER 35:

35-204 An underground facility in this instance refers to underground utilities, such as sewer lines, water pipelines, gas lines, cables, and telecommunications. Construction would be halted in the immediate vicinity of the utility until the extent of damage is determined and utility personnel have determined the course of action to be undertaken to resume service.

35-205 Fire department personnel at Adelanto would be the first to respond to a spill or accident at the Adelanto Pump Station. Oil spill containment and response equipment, as will be designated in the OSC PIAN, shall be supplied and maintained at locations accessible to first response personnel along the route to facilitate rapid response. Equipment will be stored at 12-Gauge Lake for personnel which would arrive from Adelanto. Natural gas lines parallel the pipeline route along State Route 58, U.S-395, and along Baldy Mesa Road. Pipelines of various types are not a new occurrence for any of the fire departments in any of the jurisdictions crossed.

35-206 Burial depth of the pipeline at stream crossings is to be determined by assessment of the scour depth at major stream crossings. This impact is discussed in Section 5.2.

35-207 Location of manual valves is shown on Figure 3-2. Backup power supplies are available in the event of power failure. Refer to response to Comment 22-4.

35-208 The OSC Plan will contain description of methods to contain oil spills and procedures for oil spills in waterways. The effectiveness of cleanup is determined by the overseeing jurisdictions, that is BLM, the City or County involved, or possibly the RQWCB and the State Fire Marshals office.

The pipeline crosses streams which discharge to San Pedro Bay. The streams themselves will be impacted by construction of the pipeline and in event of pipe failure. For oil to enter San Pedro Bay, a break or failure would need to occur at the crossing of the Los Angeles River or other tributary streams which discharge into San Pedro Bay. At a minimum, oil would have to travel approximately __ miles to the Los Angeles River. Oil is more likely to be contained in vicinity of the break and affect immediate stream environs. It was not necessary to address impacts to San Pedro Bay in the EIS/EIR or the OSC Plan, since the potential for a scenario of this magnitude is extremely speculative.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

General Comments on Section 5.12 System Safety and Reliability

If the Cajon Pipeline is constructed and operated, up to an additional 180,000 BPD of oil may be transported by the AAPL from the Santa Barbara Channel area and/or San Joaquin Valley area to the 12-Gauge Lake Station. This will involve additional movement of oil through about 245 miles of existing pipeline, with its attendant impact on risk of leak or rupture, pumping impacts, as well as possibly other impacts. These impacts should be addressed in the DEIS/R. 35-212

Further, if the Pacific Pipeline becomes operational, there is the possibility of some decrease in the amount of oil transported by the AAPL, as current shipments to Texas may be rerouted to Los Angeles refineries. This also should be discussed in the DEIS/R. 35-213

CUMULATIVE IMPACTS

Chapter 5.0 Environmental Consequences

Section 5.13 Cumulative Impacts

Pages 5.13-1 thru 5.13-7

Insufficient detail is provided to allow evaluation of the Proposed Project or of the other projects. For example, the biological losses are considered significant to sensitive species, but no analysis or quantitative data is included. The loss of desert vegetation should be quantified. Cumulative losses should be quantified. There should also be an analysis of whether the losses can be mitigated. Another example is the assessment of impacts to air quality. As a result of the Cajon Pipeline, the current AAPL system would be increased by 150,000 to 180,000 BPD throughput. There is no discussion of the air quality impacts that will be associated with the increased heating and pumping resulting from the increased throughput. 35-214

Section 3.5 lists numerous other projects, but Sections 5.13 does not discuss in detail any of these other projects quantitatively. Would the Kern River Gas Pipeline Adelanto Lateral create cumulative impacts, especially for sensitive desert habitats, threatened or endangered species; would it create losses of open space, infringe further on vistas, or contribute further to ORV use in the desert? Similar questions are raised with respect to the Southern California Edison 220KV Kramer-Victor #1 and 2. 35-215

There also needs to be a discussion of the cumulative impacts on riparian habitats, wildlife, water quality, spreading basins and flood control resulting from the COE flood control levee at Rio Hondo? Will the levee impact the placement and burial depth of the Cajon Pipeline?

The proposed Alameda Corridor Project is not listed or discussed. What would be the impacts on this transportation corridor? 35-216

The planned modifications to the flood control channels in urban areas are not discussed, such as the Corp of Engineers' plans at Rio Hondo. The potential impacts to sensitive groundwater, surface water, wildlife resources, recreational trails, and flood control channels are not evaluated. What precedents are being created by siting oil pipelines along flood control channels? Would other utilities also be planned in these areas? Is this in compliance with Los Angeles County's plans and plans of the various flood control authorities?

RESPONSE TO LETTER 35:

The pipeline along the flood control channels will be coordinated with the U.S. Army Corps of Engineers, or the County of Los Angeles. Pipe at these locations will either be concrete coated at stream crossings or installed in casing pipe. The actual method of construction is to be determined with consultation of the respective agencies above. This requirement is stated within Mitigation Measure 5.12.1-1(b).

35-209 On-site drainage and collections systems are specifically being used on Cajon Boulevard (MP-72) at the request of the U.S. Forest Service. It is the only location at which such curbing presently exists or will be supplemented.

35-210 Contamination of ground water is addressed in Impact 5.1.1-6. This Mitigation Measure has been revised to include clean-up of ground water supplies and percolation basins.

35-211 Should an oil spill occur, revegetation within Forest lands will necessarily be under the direction of the U.S. Forest Service. The USFS will ensure that cleanup and revegetation succeeds. Mitigation measures for monitoring and review of revegetation on other lands would be the responsibility of the regulatory agencies with jurisdiction, be they BLM, State Fire Marshals Office, or local governments. The OSC Plan will address all species and habitat of concern to both State and federal wildlife agencies. Areas of particular biological sensitivity are to be listed within the OSC Plan.

35-212 The AAPL is permitted to carry 300,000 BPD though present operations transport approximately 100,000 BPD. Environmental review for the AAPL analyzed the pipeline for its permitted capacity. Transportation of crude oil to the Cajon Pipeline will be within the permitted capacity. Therefore, impacts of increased operations have already been assessed in the environmental analysis for the original permitting of the AAPL.

35-213 This documentation is compiled to analyze the environmental impacts of the proposed project and possible alternatives. The AAPL present operation capacity may change but will not affect its present permitted operations. Possible future changes in operation of the AAPL below permitted capacity do not represent an impact which needs to be addressed for either the proposed project or the market alternatives.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

ALTERNATIVES

Chapter 6.0 Analysis of Marketing Alternatives

Section 6.2 Comparison of Market Alternatives
Page 6-1, Last Two Paragraphs (Geology)

The DEIS/R fails to note that while it is true that all the alternatives cross a number of faults, the greater the extent of the pipeline in southern California, the greater the exposure to earthquake hazards. The Cajon, Mobil-70 and Line-90 projects would require 377, 232 and 540 miles respectively, including the AAPL segments. In comparison, the Pacific Pipeline would involve only 171 miles of pipeline. The analysis also fails to review all hazards to shipping the 150,000 to 180,000 BPD from Las Flores and Gaviota Facilities. 35-217

Page 6-2, Paragraphs 1-3

The evaluation of onshore water resources does not reflect oil spill impacts and the potential to impact water users. Over 20 miles of the Cajon Pipeline would be immediately adjacent to water courses in urban Los Angeles, but no discussion of water quality impacts is included. 35-218

Page 6-2, Paragraph 4 and Page 6-5, Table 6-2

The information in Table 6-2 is incomplete and incorrect. It is incomplete with respect to the Cajon Pipeline construction impacts which are not fully evaluated. The Cajon Pipeline follows primitive "2-track" roads and restored utility right-of-ways from 12 gauge to Cajon Wash, a distance of about 71 miles. Clearing 70 feet of corridor will have adverse impacts that are not discussed.

Table 6-2 is incorrect with respect to the conclusions regarding the Pacific Pipeline. Pacific's construction impacts are in fact very low and the sensitivity of affected environments are low (especially when considered in comparison to the Cajon Pipeline). About 97 percent of the Pacific Pipeline right-of-way is in areas of currently disturbed land use activities, including active railroads, abandoned railroad, streets, and roads. About 7 acres of stream bottom and associated riparian areas would be disturbed by construction of the Pacific Pipeline. Pacific Pipeline would re-disturb about 3 miles or 18 acres of coastal sage scrub along the M-70 pipeline corridor. All other vegetation changes would be minor changes within the existing railroad corridor. The Cajon Pipeline in comparison would disturb at least 640 acres of desert communities and an unquantified amount of riparian areas. 35-219

Page 6-1, Paragraph 5

The potential of Cajon Pipeline oil spill impacts are not fully evaluated. The locations of potential spills, site-specific oil spill prevention measures, site-specific oil spill volume, and specific oil spill clean-up procedures are not discussed. Over 20 miles of the route is in flood control easements. Several desert washes are crossed. In comparison, Pacific Pipeline specifically evaluated each vulnerable and sensitive point along the 171 mile Pacific Pipeline route. Pacific's plans protect each vulnerable and sensitive point through pipeline placement, automated valves, SCADA and other systems and procedures. 35-220

Because all the projects involve transporting oil long distances, and because oil spill risks are related to distance of transport, there should be a focus on whether the pipelines' designs are state-of-the-art, whether the pipelines minimize exposure to potential hazards, and which pipelines reduce the total transport distance. Oil spill risks are related to distance of transport, the further the distance, the higher the risk. 35-221

RESPONSE TO LETTER 35:

35-214 Details of other planned projects are provided in Table 3-3. The loss of desert vegetation is stated as being significant. Mitigation measures proposed for the project would reduce this direct impact to a less than significant level however in the context of the ongoing regional increase in human disturbance of habitat and species it would remain cumulatively significant.

No changes in permitted capacity to the AAPL will occur. Therefore, no cumulative impacts above that assessed in previous environmental documentation for the AAPL will be required.

35-215 The focus of cumulative impacts analysis is the assessment of whether the proposed project in conjunction with other planned projects would have a cumulative analysis, not whether these planned projects such as the Kern River Gas Pipeline or Southern California Edison 220 kV lines would have cumulative impacts.

35-216 These projects have been included in Section 5-13.

35-217 The AAPL, though connected to the proposed project and other alternatives is a separate facility. Risks associated with operating each segment of the different pipeline systems is judged on its own characteristics. The AAPL environmental impacts were assessed in environmental documentation prepared for its own permitting and granting of right-of-way.

35-218 Discussion of oil spills impacts to water resources has been included in the analysis of marketing alternatives.

35-219 The extent of construction within Table 6-2 distinguishes between alternatives with no construction (tanker truck, rail, and marine), alternatives with limited extent of construction (heater and pump stations for Four Corner pipeline) and alternatives with large amounts of construction (the remaining pipeline alternatives).

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

The discussion should also note that the Pacific Pipeline is in a limited access railroad corridor, so that there is less risk of damage to the pipeline cause by third parties. 35-222

The discussion also fails to address the AAPL's area of transport. Not mentioned is the fact that the AAPL from Las Flores to Gaviota has a similar risk of spill as the Pacific Pipeline. According to projected oil reserves, of the total amount of oil from Gaviota and Las Flores, 72% will come from Las Flores and 28% from Gaviota indicating that the AAPL would possibly have a higher risk of spill than Pacific Pipeline along this segment. AAPL is also needed for the M-70, Cajon, and Four Corners Line 90 options in moving Las Flores Crude. 35-223

Page 6-2, Paragraph 6

The impacts section ignores the changes required of AAPL to pump and heat up to 180,000 BPD of OCS crude oil. Overall, the Cajon Pipeline results in more energy usage, more direct emissions (including more fugitive emissions from additional pump and heater stations, and from the five new 150,000 bbl. tanks), and more indirect emissions associated with heating oil and pumping it a greater distance. The significant energy requirements for the Cajon Pipeline are about 5 to 6 times greater than those for the Pacific Pipeline. There are also significant air quality impacts. The Pacific Pipeline PEA estimates annual emissions in tons as follows: 35-224

Annual Emissions (Tons)

		ROC	NO_x	SO_2	CO	PM_{10}
AAPL/Cajon	10.3	38.7	4.5	15.9	2.7	
PPSI		0.2	13.2	2.2	3.7	0.7

Page 6-3, Paragraph 4

The proposed project would require, as compared to the Pacific Pipeline, at least five times as much electrical energy in order to pump and heat the oil. In addition, the Pacific Pipeline will utilize variable frequency drives to further reduce its energy consumption. 35-225

Page 6-4, Second Full Paragraph

The statement that the overall spill risk for the Pacific Pipeline "would be less than for. . . Cajon" seriously understates the two pipelines' relative risks for potential spills. The spill risk for the Pacific Pipeline would be much less than for the Cajon Pipeline because: 1) it is roughly 2/5 the distance of the Cajon Pipeline system; 2) it is designed using a design factor of .60; Cajon/AAPL appears to use .72; 3) a spill from Pacific Pipeline would likely be smaller at sensitive receptors than from the Cajon Pipeline because the average valve spacing on the Pacific Pipeline is 2.5 miles versus the longer spacing of 3.1 miles for Cajon; 4) there is added risk for the Cajon Pipeline due to the heater stations and risk of overflow for Cajon's tank farm; and 5) It appears there is greater seismic risk on the fault crossings of the Cajon Pipeline (including the San Andreas Fault where the Working Group on California Earthquake Probabilities concluded a 30% conditional probability of a M 7.5 earthquake on the Mojave segment of this fault in the next 30 years which could result in a surface offset of 4.5 +/- 1.0 meters). The DEIS/R's analysis should be more specific and include more quantification such that these differences between the pipelines are clearly demonstrated. 35-226

RESPONSE TO LETTER 35:

The commentor is incorrect. The 71-miles from 12-Gauge to Cajon Wash are not entirely along little used utility roads. The route follows street right-of-ways within the City of Adelanto, Baldy Mesa Road and Old Cajon Boulevard, which was once a four-lane asphalted highway. The Cajon Pipeline though it disturbs native desert vegetation is within a designated utility corridor. Corridors are so designated to control utility locations. The Cajon Pipeline is located parallel to approximately 20 miles of man-made channels which have been heavily engineered. There is very limited growth in these segments of the Los Angeles River and tributary streams which the pipeline follows. An oil spill at these locations could easily be contained and would not impact sensitive riparian habitats until some distance downstream.

The Pacific Pipeline is located parallel to railroad right-of-way which is immediately adjacent to the Pacific Ocean and crosses sensitive estuarine areas with native habitat. Impacts to these areas would be significant and would require careful consideration.

35-220 Potential spill volumes are addressed in Impact 5.12.1-1. Specific oil spill containment procedures will be outlined in the OSC Plan as described in Section 5.12.

35-221 Comment noted. The Pacific Pipeline is 170 miles long, the Cajon pipeline 142 miles and the M-70 92 miles long. The AAPL is not considered as part of these individual projects. The assessment of its safety has already been undertaken and approved and operated on that basis.

35-222 All three pipelines - M-70, Cajon, and Pacific, have by design sought to reduce the potential risk of disruption to the pipeline itself by locating the pipeline in rights-of-way that are not readily accessible. This factor is included in the statistics for risk of pipe rupture and needs not to be emphasized for any particular pipeline project.

35-223 The AAPL need not be addressed as part of this project. Refer to response to Comment 35-221.

35-224 The AAPL need not be addressed as part of this project. Refer to response to Comment 35-221.

35-225 Energy requirements of the Cajon Pipeline are discussed in response to Comment 44-27.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

Page 6-5, Table 6-1

Although all pipeline air quality impacts are listed as "low," PPSI would have lower air pollutant emissions and lower risk of spill than either Cajon, M-70, or Four Corners. The High/Low ratings for the severity of spill consequences are not quantitative enough to be useful. Also, the table fails to account for the fact that spill location is the key to significance. 35-227

Page 6-5, Table 6-2

With respect to Sensitivity of Affected Environments column, Pacific Pipeline should not be considered "high" relative to M-70, Cajon, and Four Corners Line 90. Pacific Pipeline will have 2 of its 3 pump stations adjacent to AAPL in existing process plants. In addition, the Pacific Pipeline is within disturbed right-of-way for 97% of its route. Construction of PPSI would impact only about 30 acres (4.9 miles) of areas that are not currently disturbed railroad, abandoned railroad, roads or highways. 35-228

Section 6.3 Environmentally Superior Alternative (CEQA)
Page 6-6, Paragraph 2, Lines 5-6

The conclusion that the Cajon Pipeline is superior to the Pacific Pipeline fails to address the fact that approximately 13 miles of the AAPL system parallels the coast from Los Flores to Gaviota Pass and over 20 miles of the Cajon System parallels the Los Angeles Flood Control waterways. These potential oil spill pathways need to be discussed for the Cajon Pipeline as well as for the Mobil-70 and Four Corners Line 90 Pipelines. 35-229

General Comments on Chapter 6 Analysis of Marketing Alternatives

The "analysis" of the market alternatives fails to rank or judge the four projects with respect to the significance of their impacts in the areas of geology, onshore water resources, noise, visual resources, land use, utilities, socioeconomics, transportation and circulation, and cultural resources. The analyses for biological resources, air quality, and risk of spills are incomplete and inaccurate. The significance criteria, data bases and project design data are not comparable between projects. 35-230

CEQA/NEPA CONSIDERATIONS

Chapter 7.0 CEQA/NEPA Considerations

Section 7.1 Relationship of Short-Term Uses of the Environment and the Maintenance of Long-Term Productivity
Page 7-1, Paragraph 1

Many potential environmental impact analyses in Section 5 are incomplete and thus the Section 7.1 analysis cannot be completed. For example, the impacts of disturbance to desert communities and difficulty in reclaiming the disturbed habitats are not quantified. Impacts on ecosystems, land use, and visual resources are not properly addressed in Section 5 or 7.1. 35-231

Page 7-1, Paragraph 2

The Proposed Project parallels water courses for over 20 miles in the Los Angeles Basin. It has not been demonstrated that an oil spill would not significantly impact water users, biota, transportation or other 35-232

42

RESPONSE TO LETTER 35:

35-226 This statement was incorrect and has been revised. The spill risk for the Pacific Pipeline would be greater than the M-70 and Cajon pipelines because the total transport distance is longer.

35-227 The commentor's assessment of air quality emissions is based on including the AAPL in conjunction with the proposed project and alternatives. As addressed in comment 35-221, the AAPL is not part of the proposed project. The High/Low ratings were assigned as broad delineators between various alternatives. The spill location is considered in assigning the severity of spills significance.

35-228 Refer to response to comment 35-219.

35-229 The AAPL need not be addressed as part of this project. Refer to response to Comment 35-221.

35-230 Impacts were assessed in terms of long-term and short-term effects. Specific issues were not addressed as they were determined not to have significant short-term or long-term effects.

35-231 The commentor does not fully explain in what way the impacts are not properly addressed which makes it impossible for the EIS/EIR preparers to provide a detailed response. Revegetation of desert communities is possible. Refer to responses to Comments 35-91 and 35-116.

35-232 Impacts to water resources from oil spills is assessed in Chapter 5.2. See response to Comment 35-72. The AAPL is not part of this project and does not need to be assessed here. See response to Comment 35-221.

35-233 The location of a crude oil pipeline does not preclude locating future pipelines along the same route, nor does it designate the pipeline route a future utility corridor. However, as addressed in the Utility section, there is a limit to the number of utilities which can be located in one utility corridor. If the pipeline was to be used at a later date for transportation of another substance, further environmental review would be necessary.

Refer to response to Comment 36-3.

35-234 See responses to Comments 35-91 and 35-116.

COMMENT LETTER 35: PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

sensitive resources in the Ballona Creek, San Jose Creek, Rio Hondo, Los Angeles River, San Gabriel River and San Pedro Bay. Because the oil would be heated and under pressure, a pipeline break would result in the oil flowing down gradient into nearby waterways. The AAPL system, which parallels the coast and crosses numerous streams, is not discussed at all. 35-232

The use of flood control channels and sensitive groundwater spreading grounds as utility corridors including crude oil pipelines may commit future uses of these resources to similar uses. It is not clear that the Cajon Pipeline would only transport crude oil in the future and not also other products such as gasoline. 35-233

Section 7.2 Significant Irreversible Impacts

Page 7-2, Paragraph 1

The DEIS/R does not provide a basis for the statement that "the land would be able to be restored to its original condition." While the DEIS/R does not fully quantify the habitat changes, it is clear that the natural habitats of the desert portions of the route from MP 0.0 to MP 75.0 would not be restored to their original condition. The key controversy in the past has been the irretrievable loss of desert habitats associated with the development of projects such as the AAPL, Mohave, Kern River and other pipelines. 35-234

Page 7-2, Paragraph 2

The statement that the Cajon Pipeline would be buried "for 142 miles within a designated utility corridor," is false and not supported by information in the DEIS/R. 35-235

The DEIS/R fails to provide data sufficient to assess the Cajon Pipeline's irreversible impacts on biota or cultural resources. An oil spill into the Rio Hondo Creek, San Gabriel River, Los Angeles River, and Dominguez Channel has the potential to significantly impact water users and biota in these systems and in San Pedro Bay. An oil spill into one of the desert washes during a flood event could significantly impact sensitive resources. The lack of thorough impact analysis readers it impossible to complete the analysis required in Section 7.2. 35-236

Section 7.4 Unavoidable Significant Adverse Impacts Resulting from Project Implementation

Pages 7-3, Paragraphs 1-3

As the above comments demonstrate, the DEIS/R is not sufficiently quantitative and fails to identify many impacts. Consequently, the analyses for the Unavoidable Significant Impacts is incomplete and insufficient. 35-237

Section 7.5 Mitigation Monitoring Program
Pages 7-3 thru 7-4

Most of the mitigation measures proposed for the Cajon Pipeline are too general and lack project-specific details. Given the lack of specificity, it is impossible to determine how the measures will be implemented; it is also impossible to determine what level of effectiveness is acceptable and thus to determine whether mitigation goals will achieved. It is further impossible to determine when an alternative mitigation measure should be selected. Most of the mitigation measures could be for any project and may or may not be effective for Cajon Pipeline. 35-238

RESPONSE TO LETTER 35:

35-235 The pipeline would be located within a designated utility right-of-way from M.P. 0 to M.P. 74. Within the urban portion of the pipeline, the pipeline would be located within public road rights-of-way. This has been corrected on page 7-2.

35-236 An oil spill could result in a significant impact, but can be remediated and is reversible. Individual plants could be lost. Wildlife could be affected by ingestion of oil or by being immersed in oil. These plants and animals would result in the loss of individuals but not the loss of the species. Ground water, surface waters or soils could be contaminated but could be cleaned through remediation techniques.

35-237 Refer to above responses.

35-238 Mitigation measures have been specifically compiled in consultation with specialists of the BLM, and U.S. Forest Service. These measures have been revised to reflect additional concerns raised during the public review period specifically addressing concerns for specific areas of the route. More detailed methods to implement these mitigation measures will be compiled on the determination of the proposed route and when more detailed engineering drawings are available. If this project is approved, then tThese mitigation measures will be incorporated into the COM Plan.

35-239 Biological Consultation with the CDFG and USFWS is ongoing. The commentor can not provide insight to the processes of the USFWS. If additional information is required by the USFWS, it will be provided at the request of the USFWS in consultation with the BLM.

35-240 Detailed field survey was undertaken to identify and document cultural resources along the pipeline route. Of these sites, only one was identified as potentially eligible. Mitigation measures for this site have been addressed in Section 5.12.

35-241 See response to comment 35-100.

35-242 Extensive botanical survey was undertaken in desert areas and particularly along desert washes. No wetlands will be affected within the desert washes. Along channels in the urban areas, the pipeline will be located in the flood control banks and not within the channels. No extensive vegetation will be affected.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

CONSULTATION AND COORDINATION

Chapter 8.0 Consultation and Coordination

Section 8.4 Relationship to Environmental Protection Statutes and Other Requirements

Page 8-4, Paragraph 4

The DEIS/R's impact analyses are incomplete, especially with respect to oil spills. Consequently, we believe the USFWS cannot render an opinion at this time. What is the status of the USFWS Biological Opinion regarding the potential impacts? Will there be jeopardy to endangered species, and will the mitigation be sufficient? Does the USFWS recommend other field studies prior to construction? 35-239

Page 8-4, Paragraph 5

The cultural resources studies presented in Chapters 4 and 5 do not demonstrate that eligible cultural resources are not present and will not be impacted. The primary mitigation should be avoidance and it does not appear that sufficient studies were done to ensure avoidance. 35-240

Page 8-4, Paragraph 6

The air quality impacts associated with operation were not quantified in Section 5. AAPL would have to pump and heat up to 180,000 BPD of oil in excess of its current volumes. The Cajon Pipeline will pump up to 180,000 BPD of oil. The direct and indirect emissions of these activities are not quantified. Will AAPL be within its air quality permits and will they need to modify their equipment? 35-241

Page 8-5, Third Full Paragraph

The document indicates that wetlands were not identified for the project. However, it is not clear that the 20 plus miles within the flood control easements were studied. Are there wetlands in the desert washes, Cajon Creek, Etiwanda Creek, Rio Hondo, Whittier Narrows Dam and other potential areas? The onshore water resources section indicates on Page 5.2-4 that the groundwater fluctuates seasonally and dewater may be required along the Rio Hondo channel and Etiwanda Creek. If groundwater is high, are there also wetlands present? 35-242

Appendix A - Detailed Pipeline Route Maps

All Pages (Maps 1-26)

The legend page indicates that soil type, geologic formations, and stream crossings are identified in the bars at the top of the page. However, soil type is missing from many pages and geologic formations are not mapped on any. Only major streams are identified, although there must be other sensitive streams and washes.

Many fauna, sensitive plants and animals, riparian and wetland areas, and paleontologic resources were not included on the maps. What is the reason for failing to include these resources on the maps? 35-243

RESPONSE TO LETTER 35:

35-243 Labelling on route maps within Appendix A was included where necessary to locate resources. It is not prudent to show locations of sensitive species, given the sensitivity of those resources. Block valve locations have been corrected in the Final EIS/EIR.

35-244 The EIS/EIR preparers addressed the topics to the degree that they seem appropriate for inclusion in the Draft EIR/EIS. The commentor has not specifically listed the manner in which the issues have not been addressed. Sections are included in the Draft EIS/EIR for issue areas analysis: biology, water, aesthetics, roadways, and ground water contamination. Specific issues, such as mohave ground squirrel, and concerns of USFS and CDFG have specifically been addressed in the biological resources analysis. Additional comments though not addressed in the Draft EIS/EIR have been responded to in the preparation of the response to comments. These issues include: land use conflicts, crude oil sources, and Army Corps improvements to the Rio Hondo Channel. The City of Ontario's comments regarding Philadelphia Street and other facilities are addressed in Letter 18.

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

Maps 1 through 4

It appears that the maps are incomplete, not all the bars are completed such as soils, geology, hydrology, biological resources and paleontology.

Maps 10 and 11

The biological data for state and federal species appear incomplete. For example, the slender-horned spineflower, Santa Ana River Woolystar and San Diego horned lizard are not mapped. 35-243

Map 22

Why are the block valve at MP 129.9 and the check valve at MP 126.9 not plotted?

Map 23

Why is the block valve at MP 132.1 not plotted?

Appendix B – Letters

Letters from the following agencies raised issues that were not addressed or only partially addressed.

Reviewing Agency	Issues Not Fully Addressed

USEPA, August 20, 1991	• Unique or rare biota and areas with potential for significant impacts.
	  ◦ Impacts to water, floodplains and wetlands.
	  ◦ Impacts to air quality of construction and operation.
	• Identifying threats from spills and means to minimize spills including spill prevention, spill response and clean-up plan.
	• Full range of alternatives.

City of Ontario, August 22, 1991	• Aesthetics. • Explosions, ruptures, train derailments or other causes for oil spills. • General plan compliance including building set-backs and safety. • Oil spill contingency plans. • Land use conflicts. • Why more direct coastal route would not be better? • Crude oil sources and ultimate destinations for refining. • Oil spill dispersion analyses. • Are the pipelines transport materials fixed; i.e., can crude be substituted with natural gas? • Efforts on roadways. • Regular and thorough maintenance program. • Potential conflicts; Philadelphia Street, Union Pacific Railroad, Flood Control for West State Street. • Compliance with Draft General Plan - Hazards Element, 3.6 Pipelines; 3.7 Emergency Procedures.
City of Commerce, August 6,1991	• Groundwater contamination near project.

35-244

RESPONSE TO LETTER 35:

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 4, 1993

City of Bell Gardens, August 5, 1991	• Water/groundwater contamination. • Hazards material/spills/surface drainage into existing WQCB spreading basins and Rio Hondo Channel. • Risk-of-upset from earthquake, accident. • Impacts of project on planned Army Corps of Engineers raising the banks of the Rio Hondo as a preventive flood control measure. • Impact on existing riding and hiking trail on the east bank of the Rio Hondo.
City of Long Beach, July 26, 1992	• Air quality - emissions inventory, impact analysis, construction particulate emissions. • Geology - earthquake fault zones and potential impacts. • Land Use - impact and compatibility. • Onshore Water Resources - potential spill impacts. • Transportation - disruption of transportation facilities. • Terrestrial Biology - construction, operational and potential accident impacts.
California Department of Fish and Game, August 12, 1991	• Complete assessment of flora and fauna within and adjacent to the project area. • Direct, indirect and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. • Discussion of potential adverse impacts from any increased runoff, sedimentation, soil erosion, and/or urban pollutants on streams and water courses on or near the project site, and pertinent mitigation measures. • Alternatives to minimize adverse impacts to wildlife and of direct benefit to wildlife. • No net loss of wetlands.
Rancho Cucamonga, August 21, 1992	• Impacts of each alternative from the perspective of construction and maintenance. • Worst case spill scenario. • Hazards associated with pipeline rupture within or near residential areas, schools, commercial centers, groundwater recharge facilities, storm drainage channels.
City of Downey, August 21, 1991	• Impacts on Rio Hondo Channel. • Impact on COE Rio Hondo flood control project. • Measures to protect land and groundwater from contaminations in the event of an earthquake or pipeline leak.
California Department of Fish and Game, December 20, 1991	• Impacts on Mohave ground squirrel. • Mitigation for Mohave ground squirrel. • Compensation for Mohave ground squirrel.
U.S. Forest Service, October 21, 1992	• Impacts on Cajon Wash, especially for least Bell's vireo, Santa Ana speckled dace, California gnatcatcher.

35-244

RESPONSE TO LETTER 35:

COMMENT LETTER 35:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Mr. Pat Chamberlaine
January 4, 1993

- Impacts and mitigation for riparian - associated birds, including Cooper's hawk, willow flycatcher and long-eared owl. 35-244
- Oil spill impacts, especially on riparian areas.
- Mitigation by or eradication of Giant Cane (Arundo donax).

Sincerely,
PACIFIC PIPELINE SYSTEM, INC.

Marshal L. Rooney
President

RESPONSE TO LETTER 35:

COMMENT LETTER 36:
CITY OF LOS ANGELES, DEPARTMENT OF WATER AND POWER

Department of Water and Power the City of Los Angeles

TOM BRADLEY
Mayor

Commission
MICHAEL J. GALE President
RICK J. CARLISO Vice President
ANGEL M. ECHEVARRIA
DOROTHY GREEN
GIVANTMEE JOYCE
JUDITH K. DAVISON Secretary

DANIEL W. WALTERS General Manager and Chief Engineer
LEROY ALCOTTIN Assistant General Manager - Power
DENNIS WEBER Assistant General Manager - Power
PHYLLINE CURRIE Chief Financial Officer

January 4, 1993

Mr. Stephen L. Johnson
U.S. Department of the Interior
Bureau of Land Management
6221 Box Springs Boulevard
Riverside, California 92507-0714

Dear Mr. Johnson:

Cajon Pipeline Project (Project)
Response to a Draft Environmental Impact Report/Statement
(EIR/EIS)

This is in reply to your Draft EIR/EIS issued on November 1992 requesting comments concerning the above project.

This project is a proposed 142-mile-long pipeline from 12-Gauge Lake near Barstow, California, to crude oil terminals located in Carson, California, and Long Beach, California. The pipeline is to be: 20 inches in diameter, insulated, and buried. It will transport heated crude oil and will require two pump stations with storage located at 12-Gauge Lake and Adelanto, California. The maximum capacity of the pipeline is 180,000 barrels per day (BPD) with an average capacity of 150,000 BPD.

In general, the Los Angeles Department of Water and Power (LADWP) is concerned that the proposed pipeline may run longitudinally within the LADWP's right-of-way over significant lengths of the project. It is not clear from the EIR/EIS if this will be the case. More detailed information is needed regarding the exact location of the pipeline in relation to the LADWP's existing right-of-way. Extensive longitudinal use of LADWP's right-of-way is incompatible with the LADWP's Secondary Land-Use Policy. 36-1

Water and Power Conservation . . . a way of life

111 North Hope Street, Los Angeles, California 90012 Mailing address: Box 111, Los Angeles 90051-0100
Telephone (213) 481-4211 Cable address: DWPWATER • FAX (213) 481-4701

RESPONSE TO LETTER 36:

36-1 The Cajon Pipeline is proposed to be located within right-of-way which is under the jurisdiction of the U.S. Bureau of Land Management, immediately adjacent to an existing right-of-way for Southern California Edison facilities. No longitudinal encroachment of City of Los Angeles facilities should occur. However, when the final alignment is determined, if encroachment on other rights-or-way appears environmentally necessary and sound engineering principles can be preserved, consultation with existing right-of-way holder(s) will be required.

COMMENT LETTER 36: CITY OF LOS ANGELES, DEPARTMENT OF WATER AND POWER

Mr. Stephen L. Johnson - 2 - January 4, 1993

LADWP has two projects that are currently planned for construction that intersect or parallel the proposed pipeline. It is understood the centerline of the oil pipeline will be five feet westerly of the westerly edge of the existing Southern California Edison Company right-of-way between Kramer Junction and the north Adelanto City boundary. This alignment will be within the right-of-way planned to be acquired for the transmission line for the new Mead-Adelanto Project. LADWP's other project is the replacement of the Victorville-Century transmission towers in the Cajon Pass near Baldy Mesa. The proposed replacement of these towers will begin in 1995. The proposed pipeline will be drilled underneath this tower line and will cross U.S. Interstate 15 near Baldy Mesa. 36-2

In addition, the Draft EIR/EIS does not indicate if there is the capability of the pipeline to be converted to a natural gas pipeline at some future date. Although any attempt to convert the pipeline to a natural gas pipeline in the future would require a separate EIR/EIS, it is requested that the following subjects be addressed in the Final EIR/EIS for this project:

1. Are there future plans to convert the proposed pipeline to transport natural gas?

2. Is the project's specified pipe material and specified welding of joints adequate to sustain the necessary pressures to transport natural gas?

Any license, easement, or consent granted by LADWP for construction of the pipeline will be limited to the purpose of transmission of crude oil only. Conversion of the pipeline to natural gas will require reapplication. 36-3

Finally, at a minimum, the Standard Conditions for Construction (enclosed) must be complied with for construction within LADWP- or Mead Adelanto Project-owned fee or easement property, or within Bureau of Land Management-administered lands over which LADWP or the Mead-Adelanto Project hold Grants of Right-of-Way. 36-4

RESPONSE TO LETTER 36:

36-2 Use and right to the right-of-way is dependent upon timing of the acquisition from the prospective agencies. Coordination between the Cajon Pipeline project and any projects proposed by the Los Angeles Department of Water and Power will be undertaken by the Cajon Pipeline Company as further design information is available. Please refer to Mitigation Measure 5.8.1-1 (b).

36-3 As earlier discussions with the DWP have indicated, at this time there are no intentions to use the proposed project to transport gas or any other liquid. The proposed project is the construction of a pipeline to transport crude oil. It is not necessary to include any discussion or description of improvements required for anything other than crude oil transport. This is outside of the project description. If at a later date it is proposed to convert the then existing pipeline to transport gas, further environmental review would be necessary.

36-4 If any construction occurs within a Los Angeles Department of Water and Power easement property, then the Standard Conditions of Construction would be followed as required.

COMMENT LETTER 36:
CITY OF LOS ANGELES, DEPARTMENT OF WATER AND POWER

Thank you for the opportunity to comment on this project. Please keep us updated on the status of the proposed project. If you or your staff have any questions regarding these comments, please contact Mr. Rene G. Villa-Agustin of our staff at (213) 481-8668.

Sincerely,

Edward Karapetian/pw

EDWARD KARAPETIAN
Manager of Environmental and
Governmental Affairs

Enclosures

c: Mr. Rene G. Villa-Agustin w/Enclosures

RESPONSE TO LETTER 36:

COMMENT LETTER 37: CAROLE HAYTER

Carole Hayter
8339 Baldy Mesa Road
Oak Hills, Calif. 92371
January 4, 1993

Mr. Johnson
Bureau of Land Management
Riverside, Calif.

re: Response to draft EIR for the Cajon Pipeline
By FAX transmission to 909 697 5299. January 4, 1993

Dear Mr. Johnson,

I live on Baldy Mesa Road in the Highlands subdivision. My house is approximately 129 feet from the existing dirt road. Under Baldy Mesa Road are telephone lines, and two gas lines that I know of. The existing roadway is 29 feet wide and all these lines share that space.

One of the gas lines is the Cal New pipeline which is pressurized and which blew up in San Bernardino recently. It is buried 14 inches under the surface of the road. When I spoke to Cal New, they said that they were aware of the problem and had asked the County to discontinue grading Baldy Mesa Road. They have no immediate plans to rebury their pipeline. 37-1

This particular stretch of road is on a hill. Whenever it rains, water running from above washes the road on my side to the point that the tapes covering the electric lines are uncovered, a depth of about three feet. During the rains of 1992, it took four dump trucks full of dirt to cover the hole so that I could get out of my driveway.

When I called your office I was told that the Cajon Pipeline would not disturb the existing lines in the road. It would be installed some distance from the Cal New Pipeline so as not to disturb it.

I was told that there is a 200 foot wide easement for this pipeline. My property paperwork does not show this. If your easement extends 100 feet on my side of Baldy Mesa, it will be 29 feet from my house which I consider unacceptable.

If you have a 200 foot wide easement on my property, it will run through my living room and will travel through my neighbor's dining room. 37-2

Although your office assured me that the route has been thoroughly surveyed by the pipeline company, it's hard to believe that they have been down my street.

RESPONSE TO LETTER 37:

37-1 Comment noted. It is intended that 38 to 40 inches of soil would cover the pipeline. Final design of the route along Baldy Mesa Road will be coordinated with the San Bernardino County Transportation Department. Refer to response to Comment 19-13.

37-2 A 70-foot wide construction zone would be required for pipeline construction. The pipeline would lie within a permanent right-of-way varying in width between 10 to 50 feet. The easement will be located within the street right-of-way and along Baldy Mesa Road will not be within private property. The permanent right-of-way would be narrower in congested urban areas and wider in underdeveloped areas.

COMMENT LETTER 37: CAROLE HAYTER

Although Cal Nev Pipeline seems to be getting away with their negligent behavior, it is inconceivable to me that you would want another pipeline just as dangerous running side by side. 37-3

I also object to the sneaky way you have gone about this project. If I had not read an article in the Mountaineer Progress Newspaper, I would never have known what was going on. I think it is illegal not to notify affected property owners especially when their lives may be at stake. 37-4

Put me down as opposed to this project.

Sincerely,

Carole Hayter

Carole Hayter
619 949 3486
FAX 619 949 5842

RESPONSE TO LETTER 37:

37-3 The Cajon Pipeline would be at least 10 feet from the Cal Nev Pipeline. Discussion of collocation danger of pipelines is described in Section 5.8

37-4 The purpose of the EIS/EIR was to assess the environmental impacts of the proposal and its alternatives. The intent of the public meeting was to solicit input into the contents of the document. There will be an approval process which will provide additional opportunities to express your concerns regarding the merits of the projects. Property owners will be notified if there is any intent to secure easements on privately held residential property.

COMMENT LETTER 38:
CITY OF PICO RIVERA

City of Pico Rivera
6615 Passons Boulevard · Pico Rivera, California 90660
P.O. Box 1016 · FAX (310) 949-7506
Public Works (310) 801-4415

January 4, 1993

Bureau of Land Management
6221 Box Springs Boulevard
Riverside, CA 92507-0714

Attention: Mr. Stephen L. Johnson

SUBJECT: CAJON PIPELINE PROJECT - ENVIRONMENTAL IMPACT REPORT

Dear Mr. Johnson:

According to Appendix A, Maps 21 and 22, the proposed pipe line will traverse the City of Pico Rivera along the east bank Los Angeles County Flood Control Channel. This will involve crossings at the following streets:

1. Telegraph Road
2. Slauson Avenue
3. Washington Boulevard
4. Whittier Boulevard (State Highway)
5. Beverly Boulevard

38-1

All crossings at these streets must be by bore and jack methods. Open trenching will not be permitted, except under special circumstances. If permitted, all existing traffic lanes must be maintained before 9:00 a.m. for westbound traffic and after 3:00 p.m. for eastbound traffic.

The alignment proposed to extend westerly along Beverly Boulevard between the east and west banks of the Rio Hondo River will require temporary restriping of the roadway and detouring to accommodate traffic flows.

Detailed plans and profiles of the entire alignment, especially the proposed street crossings, showing all affected existing utilities must be submitted for review and approval. 38-2

E. Acevedo

Enrique Acevedo
Director of Public Works/City Engineer

EA:lg

cc: Planning Division

RESPONSE TO LETTER 38:

38-1 Crossings of these streets will not result in any interruption of traffic on the cross street. The pipeline will be constructed below the bridge (that is it will be grade-separated).

Pipeline construction will comply with other construction-related regulations of the local jurisdictions where construction activities will occur. A mitigation measure to this effect has been added to the EIS/EIR. Refer to mitigation measure 5.8.1-1 (b). Details of construction scheduling, detours, lane closures, restriping, and other measures required for construction at individual locations will be reviewed with local jurisdictions after the alignment has been finalized and construction plans have been prepared.

38-2 See response to Comment 38-1.

COMMENT LETTER 39:
COUNTY OF SAN BERNARDINO AIR POLLUTION CONTROL DISTRICT

AIR POLLUTION CONTROL DISTRICT

COUNTY OF SAN BERNARDINO
ENVIRONMENTAL
MANAGEMENT GROUP

15428 Civic Drive, Suite 200 • Victorville, CA 92392 • (619) 243-8920
Fax No. (619) 243-8925

CHARLES L. ARVIZU
Air Pollution Control Officer

January 5, 1993

Stephen L. Johnson
Bureau of Land Management
6221 Box Springs Blvd.
Riverside, CA 92507-0714

RE: DRAFT EIS/EIR FOR THE PROPOSED CAJON PIPELINE PROJECT

Dear Mr. Johnson:

The San Bernardino County Air Pollution Control District (APCD) appreciates the opportunity to provide the following comments regarding the above referenced project. The APCD is responsible for adopting and implementing air quality regulations for the San Bernardino County portion of the Southeast Desert Air Basin (District), as mandated by the federal Clean Air Act Amendments of 1990 (CAAA) and the California Clean Air Act of 1988 (CCAA). Pursuant to the California Environmental Quality Act (CEQA), Article 7, Section 15096 (d), the APCD reviews and analyzes projects that may generate significant adverse air quality impacts. The APCD then advises the Lead Agency on air quality issues that may affect the APCD's efforts in attaining required State and National Ambient Air Quality Standards in the District.

The APCD has reviewed the EIR provided. While the analysis appears adequate, there is no mitigation included for the prevention of emissions related to the anticipated construction activities associated with the project. The NO_x, CO, and PM_{10} emissions due to construction should be mitigated during all phases of construction. In addition, a Dust Control Plan should be submitted to the APCD for review and approval prior to any construction activities. 39-1

The APCD appreciates the opportunity to comment on the proposed Cajon Pipeline Project and looks forward to continued participation in the environmental review process. If you have any questions regarding our comments, please contact me at (619) 243-8921.

Sincerely,

RENEE MOSHER
Air Quality Planner

cc: Kayode Kadara, Deputy APCO

RESPONSE TO LETTER 39:

39-1 Comment noted. Mitigation measures for construction emissions have been included in Section 5.4. Refer to mitigation measure 5.4.1-1.

5.4.1-1 *A Dust Control Plan shall be submitted to the San Bernardino County Air Pollution Control District and/or the South Coast Air Quality Management District if required by their permits for approval prior to construction. The plan may include measures for watering of unpaved areas to reduce particulate emissions, moistening of vehicle loads, stabilization of stock piles, and inspection of emission control systems on heavy equipment.*

COMMENT LETTER 40:
BALDY MESA WATER DISTRICT

Baldy Mesa Water District

January 5, 1993

Stephen Johnson
U.S. Department of Interior
Bureau of Land Management
6221 Box Spring Road
Riverside CA 92507

Re: Proposed Cajon Pipeline Project

Dear Mr. Johnson:

The Baldy Mesa Water District requests that you keep us on your mailing list for this project. We also ask that you please ensure we are notified and apprised of the ongoing review and progress of this job in the future.

Through an apparent oversight, our District was not on your mailing list, nor were we notified of the various hearings and meetings in the usual manner. Therefore, we have not had sufficient time to adequately review and comment on this project, as of this date. We are somewhat concerned about this, due to the fact that the proposed pipeline route runs squarely through the center of our service area. It would seem logical that our District should be added to your list of reviewing agencies. 40-1

Should you have any questions, please contact me at this office.

Sincerely,

Wayne Wallace

WAYNE WALLACE
Engineering Technician

WW/sah

MAILING ADDRESS P.O. BOX 1347 VICTORVILLE, CA 92393
OFFICE 11855 ANACONDA ST. ("E" ST) BALDY MESA
PHONE (619) 949-0332 FAX: (619) 949-7563

RESPONSE TO LETTER 40:

40-1 Comment noted. The Baldy Mesa Water District has been added to the list of reviewing agencies for this environmental document and the mailing list for further comments.

COMMENT LETTER 41: CITY OF DOWNEY

City of Downey

FUTURE UNLIMITED

January 5, 1993

Stephen L. Johnson
Bureau of Land Management
6221 Box Springs Boulevard
Riverside, California

Subject: Comments On The Draft EIR/EIS For The Proposed Cajon Pipeline Project

Dear Mr. Johnson:

Thank you for providing us the opportunity to contribute our comments to the draft environmental impact report/environmental impact statement for the proposed Cajon Pipeline project. Our primary concern about project implementation involves the effects construction activities will generate. In particular, the noise impacts they'll produce. You can understand our concern given a section of the pipeline's proposed alignment will skirt past a residential district in Downey. In light of the proximity of impact-sensitive residences to the pipeline, we urge the Lead Agency to incorporate the mitigation measures in the final environmental document that are discussed below to safeguard residents during construction.

In regards to construction-generated noise, we believe that for the City of Downey, the final environmental document needs to include as mitigation measures the City's policies regarding construction activities. They restrict construction activities to the hours of 8:00 AM to 5:00 PM, Monday through Friday. Further, construction is prohibited on Saturday and Sundays. In addition, construction noise shall not exceed 85 db (A) across any property boundary during the course of a 24 hour day. 41-1

Additionally, to keep City Staff up to date about the progress of installing the pipeline in Downey, a representative of the firm installing it should notify the City's Director of Public Works five days before construction begins in Downey as to when it will begin in this City. The Director can be reached at (310) 904-7102. At the same time, the pipeline construction company should forward the Director a copy of the construction schedule for Downey. The representative should also forward the name and telephone number of a contact person employed by the pipeline construction company so questions can be directed to that person. In that way, City Staff will be able to direct queries from the public about the project or construction activities to the contact person. 41-2

11111 BROOKSHIRE AVENUE POST OFFICE BOX 607 DOWNEY, CALIFORNIA 90241-0607

RESPONSE TO LETTER 41:

41-1 Comment noted. Mitigation measure 5.5.1-1 recommends timing for construction so as to avoid noise impacts. Compliance with local ordinances is specified within this mitigation.

41-2 Comment noted. The Cajon Pipeline Company will provide notice of its proposed construction activities to local agencies in advance. Local agencies will also be provided additional information on construction details and scheduling prior to commencing construction.

COMMENT LETTER 41:
CITY OF DOWNEY

Page 2

Another concern we have is how the proposed pipeline will take into account the flood protection improvements the US Army Corp of Engineers is planning for both the Los Angeles and Rio Hondo Rivers. From our understanding, the pipeline will be installed along the top of the westernmost levee of both rivers, while the flood protection improvements involve the top of both rivers' levees. Flood improvements include erecting concrete parapet walls ranging in height from 2 to 8 feet along the crest of the rivers' levees and armoring the landward levee slope on both sides of each river. Assuming the pipeline will be installed before the flood improvements, do you anticipate the improvements interfering with pipeline? And if so, what measures will be taken to ensure flood protection construction will not rupture the pipeline and cause spills? 41-3

Lastly, please send us a copy of the final EIR/EIS and the mitigation monitoring program at least 10 days before the Agency is scheduled to act on the final environmental document and project, in accordance with Section 21092.5 of the California Public Resources Code. Again, thank you for the circulating the draft environmental document to us. If you have questions about the mitigation measures we're advancing, call me at 310-904-7151. 41-4

Sincerely,

Art Rangel

Art Rangel, AICP
Director of Community Development

cc: Jerry Caton, City Manager
Dick Redmayne, Director of Public Works

RESPONSE TO LETTER 41:

41-3 It has not yet been determined how the pipeline will be constructed to accommodate the planned improvements to the Rio Hondo and Los Angeles River channels. Coordination with the U.S. Army Corps of Engineers will be needed to address this issue and development a suitable engineering proposal. Steps can be taken in the design and construction of the flood control improvements to avoid interference with the pipeline.

41-4 Comment noted. No response required.

COMMENT LETTER 42:
PACIFIC PIPELINE SYSTEM, INC

PACIFIC PIPELINE SYSTEM, INC.

1727 Mesa Verde Avenue, Suite 101 • Ventura, CA 93003 • (805) 658-8742
12301 East Arapahoe Road, Suite C-10• Englewood, CO 80112 • (303) 792-2535

January 5, 1993

VIA FACSIMILE

Mr. Stephen Johnson
U.S. Department of Interior
Bureau of Land Management
6221 Box Spring Blvd.
Riverside, CA 92507

Ms. Pat Chamberlaine
City Manager
City of Adelanto
11600 Airbase Road
Adelanto, CA 92301

RE: Cajon Pipeline Draft EIS/R

Dear Mr. Johnson and Ms. Chamberlaine:

Under separate cover, Pacific Pipeline System, Inc. ("Pacific") has submitted its comments on the main text of the Cajon Pipeline Draft Environmental Impact Statement/Report ("DEIS"). As Pacific indicated in its earlier letter, the technical appendices to the Cajon DEIS/R were not available for public review until December 28, 1992, one week prior to the close of the 60-day public comment period. Consequently, Pacific indicated that the unavailability of the technical appendices during the public comment period is a significant procedural flaw which can be corrected only by extending the public review period for an additional five weeks beyond January 5, 1993. Indeed, despite its attempts to analyze and assess the Cajon DEIS/R's technical appendices before today's deadline, Pacific has been unable to complete its review of the technical appendices. 42-1

The purpose of this letter is to confirm that Pacific will be submitting comments on the technical appendices and to briefly indicate the types of issues Pacific will raise. Based on Pacific's preliminary review of the technical appendices it appears that: 42-2

* There are numerous inconsistencies between the data included in the technical appendices and statements and conclusions made in the text of the DEIS/R.

* Many of the studies were not conducted according to the required standards, such as the cultural resources

RESPONSE TO LETTER 42:

42-1 Comment noted. Your subsequent comment letter on the appendices was received and is included and addressed herein as Letter 51.

42-2 Your detailed comments are addressed in Letter 51.

COMMENT LETTER 42:
PACIFIC PIPELINE SYSTEM, INC

RESPONSE TO LETTER 42:

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 5, 1993
Page 2

investigations, which fail to meet State and BLM guidelines.

* There are numerous factual omissions which render it impossible to assess the accuracy of the reported studies or of the DEIS/R's conclusions.

* There are various factual inaccuracies. 42-2

* There are unrealistic assumptions made in the studies, such as those relating to the air emissions calculations.

* There are numerous situations in which key factors appear to not have been considered.

As indicated, Pacific will be submitting detailed comments on these and related issues as soon as possible. While Pacific will submit its comments as soon as possible, Pacific reiterates its request for specific assurance that these comments will be accepted after January 5, 1993.

Sincerely,
PACIFIC PIPELINE SYSTEM, INC.

Norman L. Rooney /tr

Norman L. Rooney
President

COMMENT LETTER 43:
CHINO BASIN MUNICIPAL WATER DISTRICT

CHINO BASIN
MUNICIPAL WATER DISTRICT
TEL (714) 987-1712
FAX (714) 987-0797
9133 Archibald Ave. P.O. Box 697
Rancho Cucamonga, CA 91729

January 5, 1993

Bureau of Land Management
6221 Box Springs Blvd.
Riverside, CA 92507-0714

Attn: Mr. Stephen L. Johnson

Subject: Cajon Pipeline Draft Environmental Impact Statement/Environmental Impact Report

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (EIR) prepared for the proposed Cajon Pipeline. Chino Basin Municipal Water District is involved in four primary service programs which could be affected by this project. These service programs include regional wastewater collection and disposal, importation of supplemental water supplies and water resources management within the Chino groundwater basin.

The alignment of the proposed pipeline will cross, or come near several District owned facilities. As a means of insuring the project will not result in any negative impacts to our facilities, finalization of the alignment and procedures to minimize potential utility interferences should be closely coordinated with District staff. Please contact Larry Miller of our Engineering Department during the design phase of the project. A Dirict facility map has been attached for your reference identifying the location of our facilities. 43-1

If we can be of any further assistance, please contact the District at your convenience.

Very truly yours,

Mark N. Kinsey
Planning Department

MNK/MAP:tc

Attachments
MK-CAJON

RESPONSE TO LETTER 43:

43-1 Comment noted. The Cajon Pipeline Company will provide notice of its proposed construction activities to local agencies in advance. Local agencies will also be provided additional information on construction details and scheduling prior to commencing construction. Refer to mitigation measure 5.8.1-1 (b).

COMMENT LETTER 44: COUNTY OF SANTA BARBARA, RESOURCE MANAGEMENT DEPARTMENT

County of Santa Barbara
RESOURCE MANAGEMENT DEPARTMENT
John Patton, Director Phil Overeynder, Assistant Director

January 5, 1993

Mr. Stephen L. Johnson
Bureau of Land Management
6221 Box Springs Blvd.
Riverside, CA 92507-0714

RE: Comments on Draft EIS/R for the Proposed Cajon Pipeline Project--CA-27497 1792, 2830 (CA-060.5)

Dear Mr. Johnson:

The Energy Division of Santa Barbara County appreciates the opportunity to comment on the Draft Environmental Impact Statement/Report (Draft EIS/R) for the proposed Cajon Pipeline Project.

The Cajon Pipeline project represents one of the concurrently-proposed pipeline projects that would be able to transport crude oil produced in the Outer Continental Shelf offshore Santa Barbara County to refineries in Los Angeles. Santa Barbara County is currently serving as Lead Agency under CEQA for a Chevron Tankering Permit request and as a Responsible Agency under CEQA for the Pacific Pipeline Project; environmental documents for both these projects identify the Cajon Pipeline as an alternative to OCS crude transportation to Los Angeles.

Overall, we are concerned that the level of information and analysis in this Draft EIS/R is too general and omits significant information necessary to evaluate environmental effects of the proposed project and its alternatives. Specifically, the Bureau of Land Management and the EIR preparer would benefit from meeting with the California Public Utilities Commission and Responsible Agencies to attain the latest information on the Pacific Pipeline System Project. The comments in Attachment A represent in detail our agency's comments on the environmental review. 44-1

Please feel free to contact Luis Perez at the Energy Division, (805) 568-2040, if you have any questions.

Sincerely,

WILLIAM J. DOUROS
Deputy Director

Energy Division
1226 Anacapa Street, 2nd Floor, Santa Barbara, CA 93101
PHONE (805) 568-2040 FAX (805) 568-2522

RESPONSE TO LETTER 44:

44-1 Comment noted. The County's individual comments are addressed in detail below.

44-2 The County makes several comments regarding the Purpose and Need section and the need to include analysis for refinery capacity and crude oil supply and demand. The Purpose and Need for the Project is a section required by the U.S. Bureau of Land Management National Environmental Policy Act Handbook. The Purpose and Need section should "generally reflect what the applicant intends to accomplish by the proposed action." The information included within the EIS/EIR satisfies this requirement. It is not necessary to provide auxiliary information that supports or denies the feasibility of this project. The EIS/EIR is the forum for environmental review.

In this light, if the proposed project resulted in significant changes to refinery operations in the Los Angeles basin, the project could have significant environmental effects. The Cajon Pipeline project is proposed to provide transportation of crude oil to replace crude from other declining sources. The Santa Barbara Crude Oil Transportation Analysis (COTA) prepared by Arthur D. Little Inc. for the County of Santa Barbara documents the 1990 and future perspective of the crude oil market and refinery options open for Point Arguello crude oil. The purpose and need for this project as foreseen by the Cajon Pipeline Company was originally based on the industry's projected loss of Alaskan North Slope (ANS) crude, as predicted in the COTA. Crude refinery capacity is anticipated to exceed supply from PADD V (that is California, Arizona, Oregon, Washington, Hawaii and Alaska) in 1993. For a full analysis of the capacities and demands please refer to the COTA.

44-3 The proposed project in this case is the construction of a 142-mile insulated pipeline capable of transporting heated crude oil to Los Angeles Basin destinations. The project description has been revised to reflect this.

44-4 Yes. The pipeline has a <u>maximum</u> capacity of 180,000 BPD. The Cajon Pipeline would have a <u>design</u> capacity of 150,000 BPD. Thus the pumps and drivers are sized to achieve the 150,000 BPD result, taking into consideration the inlet temperature of the oil from the All-American (AAPL) Heater Station. The maximum flow rate as determined by the crude oil inlet temperature would be as follows:

COMMENT LETTER 44: COUNTY OF SANTA BARBARA, RESOURCE MANAGEMENT DEPARTMENT

ATTACHMENT A

These comments have been organized consistent with the structure of the Draft EIS/R

1.0 INTRODUCTION

1.2 Purpose and Need for the Project.

The discussion on the second paragraph of this section includes percentages of crude oil that will no longer be available from Alaska by the year 2000, freeing at that time refinery capacities in Los Angeles that could be replaced by San Joaquin Valley crude and Santa Barbara County OCS crude. The Cajon Pipeline is proposed to become operational sometime in 1994, years before the Alaskan crude shortage is expected. The Draft EIS/R should include a discussion of the total amounts (not percentages) of crude that could be replaced by the crude Cajon proposes to transport. Also, identify the amount of heavy crude refinery capacity in Los Angeles for that period of time the Cajon project is proposed to be operational. 44-2

The last sentence of the third paragraph in this section (page 1-3) describes the need for "...a new heated pipeline be operational as an alternative to the blending light and heavy crude oils and transporting via an existing, unheated pipeline." We assume that since this section is discussing the purpose and need for the project, that the referenced heated pipeline is the proposed Cajon Pipeline project. This statement is misleading since the Cajon Pipeline project is not a heated pipeline. According to the project description the Cajon pipeline will carry heated crude delivered from the AAPL, there is no reference in this document of heater stations as part of the Cajon project. This Draft EIR/S must determine if the proposed project can meet its objective: 44-3

a) Can the proposed Cajon Pipeline ship 180,000 barrels of heavy crude oil from the All American Pipeline to refineries in Los Angeles? 44-4

b) Will heaters be required to ship the crude oil effectively and safely? 44-5

c) If the crude oil will be heated by others, using either new or existing heating systems, will there be new impacts above the "baseline environment" that would occur to meet the objectives of the proposed Cajon Pipeline? 44-6

On page 1-3, you reference a shipper's permit issued by Santa Barbara to the Pt. Arguello producers. Clarify, in the last sentence of the third paragraph, which permit you are referring to when you say, "This permit ..."; are you referring to the shipper's permit or the permit that may be issued for the proposed Cajon Pipeline? 44-7

1.5 Content of the EIS/EIR.

Please correct the bullet that describes the Pacific Pipeline to say from "Gaviota" instead of "Goleta". 44-8

RESPONSE TO LETTER 44:

Maximum Flow Rate

Inlet Temp. F	Flow Rate
140o	150,000/BPD
130o	140,000
120o	125,000
100o	80,000

Note: 1. Temp vs. flow rate data from MARMAC computer model
2. Crude oil is a Hondo crude.

44-5 The upstream facilities which the Cajon Pipeline will utilize are described in Section 3.2.1 of the Final EIS/EIR.

44-6 Refer to response to Comment 44-5. Heater operation is not expected to change, but due to County concerns, information regarding the existing heater station has been included within Section 4.4, Air Quality of the Final EIS/EIR. Analysis of impacts to operation of this heater station are included within Section 5.4, Air Quality of the Final EIS/EIR.

44-7 The permit referenced is the shipper's permit. This has been corrected in the Final EIS/EIR.

44-8 Comment noted. This correction has been made in the Final EIS/EIR.

44-9 Figure 3-1 (A) was included to show the general location of proposed project facilities and is referenced on page 3-1 of the Draft EIS/EIR. Cajon Terminal is clearly shown on the route maps within Appendix A (Map 1). The Adelanto Station is shown in Map 7. A plot plan is shown in Figure 3-3 (referenced on page 3-5).

COMMENT LETTER 44: COUNTY OF SANTA BARBARA, RESOURCE MANAGEMENT DEPARTMENT

Cajon Pipeline
Draft EIS/R Comments
January 5, 1993

3.0 ALTERNATIVES INCLUDING THE PROPOSED ACTION

Cajon Terminal. A map that shows the overall project and the interrelationship of all upstream facilities is needed. Project description maps and discussion fail to show the All American Pipeline and its 12 Gauge Pump Station. The exact location of the Cajon Pump Station is not evident from the referenced figure 3-3. There is no discussion of the necessary tie-ins between the AAPL project and the proposed Cajon project. Since the AAPL facility is existing, we assume that any new tie-in to transfer crude into the Cajon project would be part of the Cajon project and as such discussed in this EIS/R. Discussion of upstream facilities is necessary since they are essential to the project's ability to meet its objectives. (i.e. Cajon by itself cannot carry any crude). 44-9

Pressure Reducing Station. There is no discussion of this station anywhere in the text other than simple mention of its existence. Where is it located? Describe the impacts associated with its construction and operation. 44-10

Section 3.2.2 references a Construction /Operation Maintenance Plan that will be prepared later. We believe that construction and operation techniques are essential parts of the discussion for the EIS/R for any project in order to determine, or reduce, possible impacts that could be accomplished through construction techniques or operational procedures. 44-11

Please clarify if the SCADA system identified first on page 3-13 will operate on a pressure detection system or volume detection system. We understand that overall leak detection will operate on both volumetric and quantitative measurements. However, in various places in the Draft EIR/S, remote operations by the SCADA system are described differently as either a volume system, or pressure and volume system. 44-12

The section describing construction of the proposed project (page 3-15) has no discussion of the construction of the pump stations. 44-13

Normal Operations. This section describes how heated oil will be switched directly from the All American Pipeline into the Cajon Pipeline, bypassing Cajon's proposed storage facility. As mentioned above a description of this bypass system is needed for adequate environmental review. Furthermore, this section mentions that, alternatively, oil will be taken from storage to supplement the direct stream, however, there is no mention as to how the temperature of the crude will be maintained once stored in the large insulated tanks. There is no information to suggest that tank insulation is sufficient to maintain crude temperatures appropriate for transport without blending with other crude or heating. Include a detailed description on how operations will be conducted to manage the "alternate" transmission of crude either directly from AAPL or from the Cajon storage tanks to properly accomplish transportation of the amounts specified by the project. 44-14

RESPONSE TO LETTER 44:

A number of comments by the County address issues involving the components of the proposed project. "Project" as defined by CEQA in part as "activities involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies." By Section 15378 of the CEQA Guidelines, "Project" means the whole of an action, which has potential for resulting in a physical change in the environment. The proposed project in this case is the construction of a 142-mile insulated pipeline capable of transporting heated crude oil to Los Angeles Basin destinations.

Upstream facilities for the transportation of heavy crude oil are already existing. No new facilities would be required and will not be affected by operation of the Cajon Pipeline. As such, they are not part of the project. However, to ensure that the public and interested agencies are informed, a discussion of upstream facilities has been included within the Final EIS/EIR in Section 3.2.1.

The Cajon Pipeline will utilize the existing All-American Pipeline heater station located at 12-Gauge Lake. There will be no change in refinery operations and capacity will not be increased.

The amount of crude shipped to the Los Angeles Basin will be determined by refinery demand, market forces, and transportation costs.

44-10 The Sycamore Canyon Pressure Reduction Station will be located on the west side of Interstate 15 at M.P. 73.0. A description of the pressure reduction station is included in Section 3.2-1.

44-11 The Construction/Operation/Maintenance (COM) Plan is normally completed following finalization of engineering design, prior to construction. The elements of the COM Plan are described on page 3-11 of the Draft EIS/EIR. The COM Plan will also include mitigation measures which have been recommended in environmental review of the proposed project.

44-12 The SCADA system will be both a pressure and volume detection system.

COMMENT LETTER 44: COUNTY OF SANTA BARBARA, RESOURCE MANAGEMENT DEPARTMENT

Cajon Pipeline
Draft EISR Comments
January 5, 1993

3.3.4 No Project Alternative

The discussion of the Santa Ynez Unit oil production should be corrected to indicate start up dates in the last quarter of 1993 not second quarter 1994. **44-15**

This document needs to determine if the Cajon project as proposed will be adequate to satisfy its objective of transporting San Joaquin Valley and Santa Barbara crude to Los Angeles area refineries. References to peak production volume of 580,000 BPD of San Joaquin Valley crude that will become available by 1995 should not simply be assumed nor should Los Angeles be assumed to be the refinery destination for this oil. Additionally, preparers should be aware that refinery capacity for heavy crude in Los Angeles is limited, and in some cases refineries would require retrofits in order to handle very large volumes of the heavy crude coming from both San Joaquin Valley and Santa Barbara. We believe an analysis in this EIR/S of crude production volumes, existing pipeline capacity, and refinery capacity in Los Angeles will allow the permitting agencies to determine if the proposed Cajon Pipeline is designed for the appropriate capacity, or if a larger or smaller volume Cajon Pipeline project is more appropriate or feasible. **44-16**

The discussion on possible transportation of both San Joaquin Valley crude and Santa Barbara crude seems to be exclusively for Santa Barbara crude; the discussion does not address transport of San Joaquin Valley crude to Los Angeles. **44-17**

Line 63 is briefly discussed and then eliminated from further discussion. The text references section 3.5 as an explanation for the dismissal of the Four Corners Line 63, however, Section 3.5 discusses relationship to other projects without any mention of Line 63. AAPL + Line 63 partially satisfies the goals of the Cajon project and should be considered as an alternative. As such it should be discussed and if deemed inappropriate for further review, an explanation should be provided. CEQA guidelines 15126 establishes the screening procedure by which an alternative is either analyzed or eliminated from further review. **44-18**

The discussion of permitting of tankering from Santa Barbara needs to be revised. The discussion that generalizes the nature of tankering permits from Santa Barbara County is inadequate. The preparers speculation on page 3-28 regarding "political concerns" is neither relevant nor a reason for eliminating an alternative from consideration. Please revise this section. **44-19**

The last paragraph in page 3-28 needs to specify that Line 63 transport is to Los Angeles. Please revise. **44-20**

The last line in this section discusses excess refinery capacity still available in Los Angeles. **44-21**

3

RESPONSE TO LETTER 44:

44-13 A section on pump station construction was not included as no unusual construction techniques will be utilized. It will require ground preparation of the 2.2-acre site and installation of buildings and facilities as described on page 3-11 and shown on the plot plan in Figure 3-4.

44-14 Refer to response to Comment 44-5.

44-15 Comment noted. This correction has been made in the Final EIS/EIR.

44-16 Refer to response to Comment 44-2.

44-17 Alternative transportation modes are discussed in general. However, the most likely scenario in the case of the No Project Alternative for oil transportation from both San Joaquin Valley and Santa Barbara would be via the AAPL to the Gulf Coast or via the AAPL in conjunction with the Four Corners Line 63 to Los Angeles and the Texaco pipeline to San Francisco. This does not exclude transportation of crude oil from the San Joaquin Valley.

44-18 Section 3.5 was incorrectly referenced as the location of discussion of the Four Corners Line 63. The discussion of Four Corners Line 63 is included at the end of Section 3.4 (3.4.5.2). Refer to page 3-38 of the Draft EIS/EIR.

44-19 Comment noted. This section has been reworded in the Final EIS/EIR.

44-20 Comment noted. This section has been revised.

44-21 Refer to response to Comment 44-2.

44-22 This is a general reference to alternative modes of transportation of crude oil. Presently Los Angeles can receive crude oil from marine tankering.

44-23 The status of the Los Padres/Angeles Pipeline is given in Section 3.4.5.

44-24 Comment noted. The description of the Four Corners Line 63 Pipeline has been revised.

COMMENT LETTER 44: COUNTY OF SANTA BARBARA, RESOURCE MANAGEMENT DEPARTMENT

Cajon Pipeline
Draft EIS/R Comments
January 5, 1993

Please specify the nature and amounts of this refinery capacity.

3.4.1 Introduction (To Marketing Alternatives)

The second paragraph mentions current transport of crude oil via marine tanker. Please specify if this is a reference to Chevron's tankering Santa Barbara crude from Martinez to Los Angeles, or some other type of tankering. 44-22

Page 3-30 the EIR/S indicates that the Angeles Pipeline could be considered an alternative to the proposed Cajon Pipeline. Proponents to the Angeles Pipeline withdrew all applications for that project several years ago; we know of no plans for its permitting/construction/use. While the EIR/S does not carry it through for analysis, we believe there is no need to discuss the Angeles Pipeline, or if it is to be discussed, its status should be addressed. 44-23

3.4.5.2 Four Corners Line 63 Pipeline

The discussion of this alternative seems outdated, connections between the AAPL and Line 63 already exist, and crude oil from Santa Barbara is currently being transported to Los Angeles via the AAPL and Line 63 at volumes of 25,000 to 35,000 BPD. 44-24

3.4.5.5 Marine Tanker Transport

An alternative to a proposed project should be eliminated from consideration because of technical reasons or environmental reasons. Citing political reasons in Section 3.4.5.5 regarding marine transportation as being "viewed unfavorably by the County of Santa Barbara" is incorrect and irrelevant. Please revise this section. 44-25

4.0 AFFECTED ENVIRONMENT

This section lacks baseline information on Environmental Contamination needed to address possible impacts once construction begins. This should include screening of databases that provide an environmental assessment of major sites and comparison with the Cajon routes. This section should also include discussion of regulations that might govern the action taken if contaminated areas are encountered during construction. 44-26

The document also fails to include baseline data for Public Services and Energy. Essential to this is a discussion of the existing or needed energy facilities to provide power to the Cajon Pump Stations, communication systems, SCADA System, Cathodic protection, Uninterruptible Power Supply Systems, etc. 44-27

RESPONSE TO LETTER 44:

44-25 Comment noted. The discussion of marine tanker transport has been revised.

44-26 Refer to response to Comment 35-59.

44-27 The following outlines the electric utility requirements for the proposed project:

Electric Utility Requirements for the Cajon Pipeline

Station	Source	Length
Cajon Terminal & Station	SCE[1]	0.1 mile
Adelanto Station	SCE	0.05 mile
Sycamore Canyon Reduction Station	SCE	0.1 mile

[1]SCE - Southern California Edison

44-28 Refinery capacity is addressed in response to Comment 44-2.

44-29 Comment noted. At the time of compilation of the Draft EIS/EIR this information was not available. The utilities section for the Pacific Pipeline has been updated.

44-30 Significance criteria are by definition subjective. The level of significance is dependent upon the location to which the criteria is being applied and to the existing conditions. The significance criteria listed in each section was formatted so as to provide a concise, clear and consistent tabulation for each environmental issue. In the analysis of each impact these criteria and the analysis to support the definition of level of significance is presented.

44-31 Comment noted. Mitigation measure 5.3.1-12(a) has been revised.

COMMENT LETTER 44: COUNTY OF SANTA BARBARA, RESOURCE MANAGEMENT DEPARTMENT

Cajon Pipeline
Draft EIS/R Comments
January 5, 1993

The second paragraph restates that the No Project Alternative would probably involve importation of crude oil by marine tanker from outside of the U.S.. This comment is speculative and misleading. To simply assume that without the Cajon project there would be increases of importation of foreign crude is nearsighted; for instance, a pipeline other than the Cajon project could be developed. Discussion of refinery capacities for heavy crude in Los Angeles needs to be included. 44-28

4.8.5 Pacific Pipeline (Utilities)

Information on other utilities adjacent to the proposed route of the Pacific Pipeline is available and should be obtained from PPS. 44-29

5.0 ENVIRONMENTAL CONSEQUENCES

The significance criteria for most issue areas appear to be subjective. For instance, the biological resources section (5.3) cite as a criteria a "Substantially diminished or reduced habitat for fish, wildlife or plants." Such a criteria leaves the reader to reach his or her own conclusion as to what "Substantially diminished" may mean. Whatever the preparers used to make the determination as to the meaning of this and all significance criteria should be articulated in this document, making criteria more objective. Also, there are a number of government codes and thresholds within different jurisdictions that should contribute to the establishment of the standards of significance. 44-30

It appears the mitigation measures referenced for impact 5.3.1-12 are incorrect; did you mean to reference mitigation measures 5.3.1-11, rather than -10? 44-31

5.12 System Safety

The Systems Safety section should include burial of the pipeline at least 6 ft. deep as a mitigation measure to spill rupture. The applicant has proposed standard burial of only 3 to 4 feet (page 3-18). 44-32

6.0 ANALYSIS OF MARKETING ALTERNATIVES

The analysis in many of the issue areas of the alternatives to the proposed project is insufficient and too general. It is impossible to understand how the alternatives may affect the environment so that the reader can determine if the comparison of alternatives, Section 6.0, accurately assesses the environmentally superior alternative. We direct you to the Systems Safety section which appears to have the best discussion of the potential impacts from the alternative projects. 44-33

RESPONSE TO LETTER 44:

5.3.1-12(a) *Implementation of Mitigation Measures 5.3.1-11(a), (b), and (c), and 5.2.1-6.*

44-32 Minimum pipeline depth is governed by State regulation. Cajon Pipeline Company proposed a burial depth of 4 to 6 feet, although the burial depth may be greater depended upon the location (for example, stream crossings). The State Fire Marshal has reviewed this document and found that the pipeline burial depth was consistent with regulations. Refer to Letter 20.

44-33 The comparison of the alternatives is summarized from information that is presented in each issue analysis. Information for each of these alternatives was drawn from available environmental documentation and review of the pipeline route. The extent of the analysis for these alternatives where other documentation is available is entirely dependent upon the level of detail in the referenced documents and the magnitude to which the impacts vary. Many of the impacts, such as construction impacts, are similar in the case of new pipelines. The System Safety and Reliability section for each of the then proposed pipeline (M-70 Pipeline, Pacific Pipeline) was presented in detail and was necessary to be explained in detail.

COMMENT LETTER 45:
SABO AND GREEN

RESPONSE TO LETTER 45:

SABO & GREEN
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 400
6222 CANOGA AVENUE
WOODLAND HILLS, CALIFORNIA 91367
818) 704-0185
TELECOPIER 818) 704-4729

January 7, 1993

Bureau of Land Management
6221 Box Springs Boulevard
Riverside, California 92507-0714
ATTN: Stephen L. Johnson

City of Adelanto
11600 Airbase Road
Adelanto, California 92301
ATTN: Roland Dorval,
City Engineer

Re: Comments and Objections to the November, 1992 Cajon Pipeline Draft Environmental Impact Statement/Environmental Impact Report

Dear Messrs. Johnson and Dorval:

This office represents the Victor Valley Economic Development Authority, a joint powers authority whose members include the County of San Bernardino, Cities of Victorville and Hesperia and Town of Apple Valley ("VVEDA"). These comments and objections are submitted on behalf of VVEDA concerning the November, 1992 Cajon Pipeline Draft Environmental Impact Statement/Environmental Impact Report ("Draft EIS/EIR") for the proposed construction of a 142-mile-long, 20-inch diameter insulated pipeline from 12-Gauge Lake, California to the Los Angeles crude oil terminals in Carson and Long Beach, and related appurtenances including two pump stations, a storage area and control and maintenance facilities ("Project").

These comments represent major issues regarding the content, format and evaluation methods of the Draft EIS/EIR and may be supplemented by VVEDA prior to the end of the public hearings on the proposed Project.

Unfortunately, the Draft EIS/EIR is inadequate for the purpose of evaluating the environmental impacts of the Project. In order to correct the inadequacies of the Draft EIS/EIR, significant new information will be required, necessitating the recirculation

COMMENT LETTER 45: SABO AND GREEN

January 7, 1993
Page 2

of the Draft EIS/EIR so that VVEDA and other affected agencies and members of the public will be able to comment on such information.

For your convenience, the following comments are provided in list form.

1. The Draft EIS/EIR does not comply with the requirements of the National Environmental Policy Act ("NEPA"), the NEPA Guidelines, the California Environmental Quality Act ("CEQA") or the Guidelines for Implementation of CEQA ("CEQA Guidelines"). The Draft EIS/EIR is not an informational document which will inform either the Bureau of Land Management or the City of Adelanto specifically, or the public generally, of the significant environmental effects of the Project, identify ways to minimize the significant effects and describe reasonable alternatives to the Project. 45-1

2. The Draft EIS/EIR fails to adequately assess and analyze the responsibilities of, and the environmental effects on the lead, responsible, trustee and affected agencies. 45-2

3. The Draft EIS/EIR, for the most part, is comprised of conclusory statements with limited analysis. The Draft EIS/EIR generally does not identify specific environmental impacts or disclose the methodology and supporting data and information representing the basis for the conclusions reached, as required by CEQA. Mere conclusions without support are inadequate. Laurel Heights Improvement Association v. Regents of the University of California (1988) 47 Cal. 3d 376. 45-3

4. The Draft EIS/EIR does not present the environmental impacts of the proposed Project and other alternatives in a form which sharply defines issues and provides a clear basis for a choice. The alternatives included are not feasible actions which would reduce or eliminate the significant effects of the Project. 45-4

5. The Draft EIS/EIR does not adequately identify the effects of the Project and alternatives and their significance. The Draft EIR defers the assessment and identification of certain important issue areas to a project-by-project review at some future time. 45-5

RESPONSE TO LETTER 45:

In preparing responses to comments and issues raised by the commentor, the EIS/EIR preparers have been handicapped by the lack of detailed comments specifically referenced to the Draft EIS/EIR. To the best of our ability, the EIS/EIR preparers have attempted to explain and give detailed information in response to the following comments. The reader however, must be informed that when comments are general in nature and do not reference specific sections with page numbers, or specific impacts or specific mitigation measures, it is difficult to respond directly with a full explanation.

45-1 The EIS/EIR does fulfill the requirements of both NEPA and CEQA. The significant environmental effects are analyzed in Chapter 5 of the Draft EIS/EIR. Mitigation measures to reduce the environmental impacts of the proposed project are set forth in Chapter 5.

45-2 The responsibilities and effects upon the lead, responsible, trustee and affected agencies are discussed in several different sections of the Draft EIS/EIR. Section 1.4, Environmental Review outlines what is required of the lead agencies. The approval requirements are tabulated in Table 1-2. Section 8.3 discusses the coordination with federal, state, and local agencies.

45-3 Specific environmental impacts are outlined in Chapter 5 of the Draft EIS/EIR. The format used in this document was chosen to specifically avoid the problem the commentor has raised. The impacts of the proposed project are stated concisely, followed by explanatory text, and specific mitigation measures to address each impact.

45-4 The environmental impacts are presented in Chapter 5 of the Draft EIS/EIR. The alternatives proposed were selected to avoid or reduce significant environmental impacts which were identified in environmental review of the proposed project. Project Alternatives are discussed in Section 3.3 The segment alternatives are certainly feasible alternatives. Marketing alternatives are also presented as they are alternative means of achieving the objectives of the Cajon Pipeline. These alternatives are certainly feasible. As an example, the Pacific Pipeline is in fact being pursued by other pipeline companies.

45-5 Chapter 2 summarizes the environmental analyzes presented in Chapter 5. Table 2-1 clearly states the level of significance without mitigation for each impact identified.

COMMENT LETTER 45: SABO AND GREEN

January 7, 1993
Page 3

6. The Draft EIS/EIR does not adequately focus on the specific effects of the Project. CEQA Guidelines § 15146(a). 45-6

7. The Draft EIS/EIR does not address the extent of the physical changes that can be expected as a result of the Project. 45-7

8. The Draft EIS/EIR fails to adequately analyze and assess specific mitigation measures which will reduce or eliminate the Project's significant effects on the environment. Source of funds necessary to implement mitigation measures are not discussed. 45-8

9. The Draft EIS/EIR does not adequately identify and analyze the significant effects of the Project on the Cities of Victorville and Hesperia, the Town of Apple Valley, unincorporated areas within the County of San Bernardino and other individual cities and communities. 45-9

10. The Draft EIS/EIR does not adequately identify the cumulative impacts associated with the Project and other alternatives. 45-10

11. The Project Description included in the Draft EIS/EIR is inadequate. The specific location and boundaries of the Project cannot be determined from the Maps included in the Project Description. 45-11

12. While the Draft EIS/EIR includes a list of public entities who will use the Draft EIS/EIR, it does not adequately refer to the decisions which must be made by those entities, and does not reference the order in which the decisions will occur. 45-12

13. A Draft EIS/EIR is required to be written in plain language that facilitates review by the public. However, this Draft EIS/EIR fails to fulfill such requirement and hides the true impacts of the Project behind technical language. 45-13

14. The Draft EIS/EIR references other documents containing important information regarding the environmental setting of the Project. However, there is no summary of the contents of the documents in this Draft EIS/EIR, no reference to the portions of the documents in which the 45-14

RESPONSE TO LETTER 45:

45-6 The specific effects of the proposed project are addressed in Chapter 5 of the Draft EIS/EIR.

45-7 The physical changes which will occur as a result of the proposed project are described in detail within Section 3.2 of the Draft EIS/EIR.

45-8 Specific mitigation measures for each impact identified as a result of implementation of the proposed project are presented in Chapter 5 and summarized in Table 2-1. Table 2-1 designated the responsible or lead agency for implementation of each of these mitigation measures. The Cajon Pipeline Company's financial responsibility shall be consistent with federal, state, and local statutes.

45-9 Impacts on cities and communities are discussed in several sections. Socioeconomic effects are discussed in Chapter 5.9 . This section presents analysis for the communities through which the pipeline passes and for the impact by county study area. Other issues of the physical environment such as geology, water, biology, traffic, air, noise, are discussed in each issue analysis in Chapter 5.

45-10 Cumulative impacts for the proposed project are presented in Section 5.13 of the Draft EIS/EIR.

45-11 The Project Description includes reference to Appendix A which contains route maps of the pipeline on U.S. 7.5 minute quadrangle sheets which have been reduced slightly to allow inclusion and ready availability to the reader. At this time location is indicated by the street name through which the pipeline route passes. The decision of what specific side of the street or exact location to this level is not known until further engineering design is completed and the cities and communities through which the route passes have reviewed the proposed location.

45-12 The permits and approval requirements by various agencies are tabulated in Table 1-2.

45-13 The EIS/EIR preparers have diligently sought to present the analysis in plain language that can easily be understood by the lay-person. To this end the document has been reviewed by the lead agencies and by editors with little technical background to ensure that information is highlighted and explained if overly technical.

COMMENT LETTER 45: SABO AND GREEN

January 7, 1993
Page 4

information is contained, nor an indication of where the documents are available for review.

15. Portions of the Draft EIS/EIR are internally inconsistent. 45-15

16. The Draft EIS/EIR fails to analyze the impacts of the presence of hazardous wastes and does not discuss how the Project may bring people into contact with hazardous waste. CEQA Guidelines Section 15126. 45-16

17. The Draft EIS/EIR fails to analyze all reasonable alternatives to the Project including those capable of reducing or eliminating environmental effects. County of Inyo v. City of Los Angeles (1977) 71 Cal.App. 3d 185. 45-17

18. The "no project" alternative contained in this Draft EIS/EIR is not a "no project" alternative within the meaning of CEQA. Dusek v. Anaheim Redevelopment Agency (1985) 173 Cal.App. 3d 1029. 45-18

19. The Summary of Significant Environmental Impacts contained in Section 2.0 of the Draft EIS/EIR is misleading relative to the more detailed discussion of such impacts contained in Sections 5.1 through 5.13 of the Draft EIS/EIR. 45-19

20. The Draft EIS/EIR does not adequately discuss the Project's propensity to encourage and facilitate other activities outside the project area that could significantly affect the environment, either individually or cumulatively. 45-20

21. The Draft EIS/EIR fails to do a reasonable analysis of the traffic/circulation impacts associated with the Project. 45-21

22. The Draft EIS/EIR fails to use the standard accepted methods of evaluating traffic/circulation impacts and thereby understates the true traffic impacts associated with the Project. 45-22

23. The Draft EIS/EIR's traffic/circulation analysis is based upon unreasonable assumptions. 45-23

24. The discussion of cumulative impacts does not contain a complete list of past, present and 45-24

RESPONSE TO LETTER 45:

45-14 The documents referenced in the Draft EIS/EIR have been summarized in each of the setting and environmental consequences sections in the alternatives discussion and the specific environmental issues which required detailed analysis. The introductory page of Section 4 and 5 explains that the documents describing the alternatives are available at the BLM and the City of Adelanto. The technical appendices referenced in this document are also stated on page 4 to be available at these agencies.

45-15 The EIS/EIR preparers have sought consistency within the document by extensive review by the lead agencies and technical editors of text, acronyms used, references to specific agencies and terminology.

45-16 Soil contamination is addressed in Impact 5.1.1-5. Additionally the Cortese List has been reviewed for the pipeline route and information included in the discussion of Impact 5.1.1-5.

45-17 The CEQA Guidelines state that "the discussion of alternatives shall focus on alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance". The BLM and Adelanto have gone beyond the intent of CEQA and NEPA by identifying two ways with which the project could be implemented by different routes and proposals or by other transportation means. Significant environmental impacts which are a result of the route of the pipeline included removal of native vegetation in the desert portion of the segment and significant earth disruption in hills to the west of Cajon Wash. Two alternative alignments were proposed and evaluated within the document which seek to reduce the environmental impacts of the proposed route. These are discussed as "marketing" alternatives, but are outside the scope of approval by lead agencies.

COMMENT LETTER 45:
SABO AND GREEN

RESPONSE TO LETTER 45:

45-18 Dusek v. Anaheim Redevelopment Agency (4th Dist. 1986) 173 Cal.App.3d 1029, 1043 [219 Cal.Rptr.346, 354] involved the "no project alternative" requirement. In that case, the Court stated that "[a] 'no project' alternative must describe maintenance of the existing environment as a basis for comparison of the suggested alternatives to the status quo." As described in Section 3.3.4 No Project Alternative, this alternative assumes that the Cajon Pipeline would not occur. However, market forces are such that the oil would be anticipated to reach the Los Angeles basin if there is a demonstrated need. If the proposed project was not to occur, impacts to construction would not occur, but oil would be transported by other means which would create impacts which have been described as potentially more significant than those which would be anticipated as a result of construction of the Cajon Pipeline.

45-19 The summary of impacts presented in Table 2-1 of the Draft EIS/EIR is a verbatim reproduction of the impacts statements and mitigation measures recommended in Chapter 5 of the Draft EIS/EIR. A summary by definition is a more concise representation of the detailed information.

45-20 Growth inducing impacts are addressed in Section 7.3. In addition secondary socioeconomic impacts to the region which encompasses Los Angeles and San Bernardino Counties is represented in Chapter 5.9.

45-21 The commentor does not give a definition of what he would consider a "reasonable analysis" for traffic impacts. Traffic impacts as a result of the proposed project are addressed in Section 5.10. Traffic impacts are considered significant if long term traffic impacts would cause congestion, if delays of more than 30 minutes would occur on arterials, if permanent impacts to transportation network would occur, or if emergency access would be precluded. Traffic impacts have been identified to occur during the construction period. Mitigation measures have been presented to reduce these impacts to a less-than-significant level.

45-22 Evaluation of traffic impacts follows a standard methodology. Implementation of the proposed project would generate traffic for construction only. Level of service standards which are normally applied to projects which result in significant traffic generation are not applicable in this instance. The impacts discussed in the previous comment have been discussed in detail in Section 5.10.

COMMENT LETTER 45: SABO AND GREEN

reasonably anticipated future projects producing related or cumulative impacts. CEQA Guidelines § 15130.

25. The Draft EIS/EIR fails to recommend adequate mitigation measures to mitigate cumulative impacts. 45-25

26. The Draft EIS/EIR does not indicate the reasons that various possible significant effects of the Project were determined not to be significant and were therefore not discussed in detail in the Draft EIS/EIR. CEQA Guidelines § 15128. 45-26

27. The combined Draft EIS/EIR circumvents several of the distinct and independent requirements imposed by CEQA and the CEQA Guidelines on the one hand, and NEPA and the NEPA Guidelines on the other. Separate documents should be prepared to address these State and Federal laws. 45-27

28. The Draft EIS/EIR does not include any discussion of "areas of controversy" or "issues to be resolved" concerning the Project. 40 CFR §1502.12. 45-28

29. The Draft EIS/EIR fails to analyze the environmental impacts associated with the construction of the storage area and control and maintenance facilities. 45-29

30. The Draft EIS/EIR fails to adequately analyze the environmental impacts associated with the construction of the pump stations and fails to analyze the significance of such impacts. 45-30

31. The Draft EIS/EIR fails to include a description of the local land use plans, policies and controls of the Cities of Victorville and Hesperia, the Town of Apple Valley and San Bernardino unincorporated areas. 45-31

32. The Draft EIS/EIR fails to address possible conflicts between the Project and the objectives of local land use plans, policies and controls of the Cities of Victorville and Hesperia, the Town of Apple Valley and San Bernardino County unincorporated areas. 40 CFR §1502.16(c). 45-32

33. The Draft EIS/EIR fails to discuss inconsistencies of the Project with approved local plans and laws 45-33

RESPONSE TO LETTER 45:

45-23 The assumptions in assessing the construction traffic generation are discussed in Impact 5.10.1-2. These are standard assumptions for passenger car equivalency.

45-24 Cumulative impacts are addressed in Section 5.13. The cumulative analysis is based on planned and approved projects identified in the jurisdictions through which the pipeline route passes as well as general future development trends analyzed in the South Coast Air Basin Air Quality Management Plan. The projects included within the cumulative analysis are listed in Table 3-3. The reference to this table was incorrect on page 5.13-1. It has been corrected in the Final EIS/EIR.

45-25 Significant cumulative impacts to biological resources in the desert, and collocation danger in the Cajon Pass were identified in Section 5.13. Mitigation for these impacts are addressed in the respective environmental issue analysis - Sections 5.3 and 5.8 respectively.

45-26 The commentor does not indicate to which impacts the comment is directed. The vagueness of the comment means that an exact detailed response can not be given. Impacts have been categorized as less-than-significant or significant within Chapter 5. A discussion follows each impact statement to give supporting detail as to the reason for the impact and the level of significance. Mitigation measures have been proposed to reduce the level of significance for those impacts which were determined to be significant.

45-27 For projects that must comply with both CEQA and NEPA, the Guidelines and the NEPA regulation strongly urge local, state and federal agencies to work together to prepare single documents that will satisfy both state and federal law. This recommendation was added to the guidelines in the interest of efficiency. The Guidelines for both NEPA and CEQA have been followed in compilation of the this document and therefore can be used to meet state and federal requirements.

45-28 The CEQA Guidelines require under Section 15123 that an EIR shall contain a brief summary of the proposed actions and its consequences. The summary shall identify areas of controversy known to the lead agency including issues raised by agencies and the public. This section was omitted from the Draft EIS/EIR. it has been included in Chapter 2, Synopsis of Project and Alternatives of the Final EIS/EIR.

COMMENT LETTER 45:
SABO AND GREEN

RESPONSE TO LETTER 45:

45-29 Impacts associated with storage and maintenance facilities (presumably Cajon Terminal and Adelanto Pump Station) have been addressed in several sections. The major impacts with these two facilities are biological, visual, noise, and hydrology. These issues are addressed in the respective sections.

45-30 The major impacts identified with pump station construction and operation are noise and visual impacts. These are addressed in the appropriate sections of the Draft EIS/EIR (Section 5.5 and 5.6).

45-31 Early consultation and the public review process has provided an opportunity for all cities along the route to comment on consistencies with local policies and ordinances. Cities have responded with information on local plans and policies. In addition, mitigation measure 5.8.1-1(b) has been included to ensure that local jurisdiction and agencies are contacted and coordinated with to ensure consistency.

5.8.1-1(b) *The alignment of the pipeline will be designed to minimize or avoid interference with plans, policies, and existing and planned infrastructure during its construction. All affected agencies will be consulted regarding the precise alignment of the pipeline within their respective jurisdictions in order to minimize or avoid interference with existing and planned infrastructure and public facilities.*

45-32 Refer to response to Comment 45-32.

45-33 Refer to response to Comment 45-32.

COMMENT LETTER 45: SABO AND GREEN

of the Cities of Victorville and Hesperia, the Town of Apple Valley and the San Bernardino County unincorporated areas, nor the extent to which the Project would be reconciled with such plans and laws. 40 CFR §1506.2(d).

34. The description of the affected environment contained in Chapter 4 of the Draft EIS/EIR should be succinct and no longer than necessary to understand the effects of the proposed action. Data and analyses should be commensurate with the importance of the impact. 40 CFR §1502.15. However, this Draft EIS/EIR contains a description of the environment that exceeds 100 pages. Some of the material is not relevant to the environmental impacts of the proposed action and the alternatives. As a result, important aspects of the existing environment, such as soils and water supply conditions, become difficult for the decisionmakers or the public to discern. This Chapter should be reduced in size in order to fulfill its proper function. 45-34

35. The Draft EIS/EIR fails to adequately address the environmental effects of the Project on urban quality, historic and cultural resources, and the design of the built environment, including the reuse and conservation potential of various alternatives and mitigation measures. 40 CFR §1502.16(g). 45-35

36. The Draft EIS/EIR unduly minimizes the significance of the Project's impact on soils, on-shore water resources, biological resources and air quality. 45-36

37. The Draft EIS/EIR fails to consider and adopt feasible mitigation measures for the Project's impact on soils, on-shore water resources, biological resources and air quality. 45-37

38. The Draft EIS/EIR fails to address the conservation potential of the Project or any of the alternatives. 40 CFR §1502.16(e) and (f). 45-38

39. It is inappropriate for the Draft EIS/EIR to conclude that the Project's interference with the operation of the Whittier Narrows Dam, Etiwanda Creek percolation basins, the Rio Hondo spreading basins and the Dominguez Gap percolation ponds is 45-39

RESPONSE TO LETTER 45:

45-34 In preparing the EIS/EIR, the preparers and lead, responsible and reviewing agencies have sought to be concise and present information in lay-person language. The pipeline traverses 142 miles, varying from open desert to congested urban environments. The proposed project and alternatives would result in impacts to a variety of resources. To ensure that each of these impacts are addressed, an adequate baseline of the environmental setting must be fully presented. The chapter has been broken into a number of subsections to ensure that information is easy to find. Each subsection addresses not only the proposed project but also the two route alternatives, three marketing alternatives, and the no project alternative. An index has also been provided for easy cross-referencing. Reducing the size and content of this chapter would result in a superficial presentation of the existing environmental and would not fulfill the intent of CEQA or NEPA.

45-35 Extensive cultural studies have been undertaken as part of the preparation of the document. The results of these studies are presented in Section 5.11, Cultural and Paleontological Resources.

The proposed project involves the construction of a below grade pipeline for the preponderance of the proposed route. The only exception would at the Cajon Terminal and the Adelanto Pump Station. Within the urban areas, the project would be located within existing right-of-ways. For these reasons, it is difficult to understand the concern of the impacts on urban quality.

The CEQA Guidelines under Section 15126(c) requires that, "energy conservation measures as well as other appropriate mitigation measures, shall be discussed when relevant." Additionally Section 15126(e) requires that any significant irreversible environmental changes which would be involved in the proposed action should it be implemented be identified. Uses of nonrenewable resources may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Significant irreversible impacts are identified in Section 7.2 of the Draft EIS/EIR.

COMMENT LETTER 45: SABO AND GREEN

January 7, 1993
Page 7

only potentially significant and that the discharge of test water resulting from the hydrostatic testing of the pipeline is less than significant.

40. Section 7.1 of the Draft EIS/EIR should compare the value of the Project's short term use with the maintenance and enhancement of long-term productivity. 40 CFR §1502.16. 45-40

41. The Draft EIS/EIR does not address the impacts of the Project and alternatives on fire and rescue services. 45-41

42. The Draft EIS/EIR drastically underestimates the probability of an accidental oil spill as a result of the Project and alternatives, and unduly minimizes the significance of the effects of such an oil spill. 45-42

43. Neither the Bureau of Land Management nor the City of Adelanto consulted VVEDA or its Member Jurisdictions during the preparation of the Draft EIS/EIR. 45-43

Revisions to this Draft EIS/EIR incorporating responses to the above comments, and revisions as requested by the above comments are required before the Draft EIS/EIR may be considered adequate. Furthermore, these revisions will require the addition of significant information to the Draft EIS/EIR, and therefore the Draft EIS/EIR must be recirculated.

We look forward to receiving your responses to the above listed concerns and the concomitant revisions to the Draft EIS/EIR.

Very truly yours,

SABO & GREEN,
A Professional Corporation

By: Edward W. Pilot
Edward W. Pilot

ENP:GM
V:\Sa\SOG\L7B59
1/7/93 2:33

RESPONSE TO LETTER 45:

45-36 The commentor has not presented any evidence to support this comment and therefore specific response are difficult. The impacts of soils, on-shore water resources, and biological resources have been identified as significant. Mitigation measures were reviewed with lead and responsible agencies for feasibility of implementation. Mitigation measures were included which satisfied field experts of the Bureau of Land Management, U.S. Forest Service and engineering department of the city of Adelanto and which could reduce the level of significance of the impact.

45-37 See response to Comment 45-36.

45-38 See response to Comment 45-35.

45-39 The commentor does not explain or present any information to support his statement of why it is "inappropriate" for these determinations to be made in the document. Significant impacts to operation of percolation and spreading basins could potentially occur if coordination with the respective agencies is not undertaken. Hydrostatic test water will only be permitted to be discharged under an NPDES permit regulated by the RWQCB. This will ensure that no significant impacts occur (Impact 5.2.1-4).

45-40 Long term productivity of this project relates to the transport of crude oil and subsequent development of an energy resource. Without construction of such a project the long-term productivity may be diminished.

45-41 Fire and rescue personnel of the local jurisdictions are anticipated to be the first on the scene of a leak or rupture. However, additional personnel and equipment would soon be dispatched to provide assistance. The Oil Spill Contingency Plan (described in sections 3.2 and 5.12 of the Draft EIS/EIR) will establish procedures for emergency response, including designation of responsibilities and a listing of additional manpower and equipment which would be dispatched to scene as part of standard response procedures. While in the event of a major rupture the city's emergency response alone may not be adequate, the Oil Spill Contingency Plan will provide for the level of emergency response needed. Impacts to local jurisdictions are not anticipated as the required trained personnel will be provided by the Cajon Pipeline Company.

COMMENT LETTER 45:
SABO AND GREEN

RESPONSE TO LETTER 45:

45-42 The commentor does not explain or present any information to support his comment. The methodology for determining the spill risk of the proposed project is presented fully and in detail in Section 5.13. It is based upon information which is collected by the EPA.

COMMENT LETTER 46:
CITY OF RANCHO CUCAMONGA

THE CITY OF

RANCHO CUCAMONGA

January 7, 1992

Mr. Stephan L. Johnson
Bureau of Land Management
6221 Box Springs Boulevard
Riverside, CA 92507-0714

SUBJECT: CAJON PIPELINE ENVIRONMENTAL IMPACT REPORT - CAJON PIPELINE COMPANY - A proposal to construct a 142-mile long, 20-inch diameter, insulated and buried pipeline from 27 miles west of Barstow to Long Beach, California, for the purpose of transporting heated crude oil. The pipeline route through the City of Rancho Cucamonga is generally proposed for the north side of I-15, crossing under I-15 in the vicinity of Arrow Highway, and thence continuing southward parallel to Day Creek Channel. (GR 91-13)

Dear Mr. Johnson:

Thank you for the opportunity to comment on the subject Environmental Impact Report.

We have some general concerns about the pipeline project, including potential impact on land use, potential impact on ground water supplies, and a question about the route selection.

46-1

We also have several concerns about direct impacts on the City of Rancho Cucamonga, including coordination of emergency response in the event of a pipeline emergency, right-of-way acquisition, specific alignment of the pipeline, and short-time construction impacts within the City.

Regarding general concerns about the pipeline project, the land use section does not discuss the potential for conflicting land use of the pipeline through urban areas. Will land use be restricted over or adjacent to the pipeline? For example, could vibrations from an existing, adjoining heavy industry impact the pipeline?

46-2

Further, we are concerned about the long-term potential for groundwater degradation within the Chino Ground Water Basin. Within Rancho Cucamonga, the general route will cross San Sevaine Creek/Etiwanda Creek, and Day Creek. Further, the route will parallel the San Sevaine Basins I-5, located west of Cherry Avenue and I-15. The basins are used for ground water recharge and proposed for percolation of State Water by Metropolitan Water District. Therefore, we request that the Metropolitan Water District, Chino Basin Municipal Water District, Santa Ana Regional Water Quality Board, and the San Bernardino County Flood Control District comment on the following:

46-3

Mayor Dennis L. Stout
Mayor Pro-Tem William J. Alexander
Jack Lam, AICP, City Manager

Councilmember Diane Williams
Councilmember Pamela J. Wright
Councilmember Charles J. Buquet II

10500 Civic Center Drive • P.O. Box 807 • Rancho Cucamonga, CA 91729 • (714) 989-1851 • FAX (714) 987-6499

RESPONSE TO LETTER 46:

46-1 Comment noted. Individual comments are addressed in the following responses.

46-2 No permanent structures may be constructed atop the pipeline right-of-way. There are no restrictions on land uses and the construction of structures adjacent to the right-of-way. Since the pipeline will be buried and will not present any significant hazard to adjacent uses, no land use conflicts are anticipated after the pipeline is constructed and in operation.

46-3 Special measures will be taken to prevent rupture of the pipeline in washes and groundwater recharge areas, especially in areas where ground displacement during a seismic event is possible. A pipe with thicker walls will be used in these areas and the pipeline will be designed to rise to the surface if ground displacement occurs. This would cause any possible spills to occur on the surface where clean-up is more efficient. Once the crude oil has cooled after a spill, it will not penetrate the ground surface to any great depth due to its heavy, viscous nature. Each of the agencies mentioned by the commentor were sent a copy of the Draft EIS/EIR for review and comment. Letters 19, 27, and 43 have been responded to herein.

COMMENT LETTER 46:
CITY OF RANCHO CUCAMONGA

MR. STEPHEN L. JOHNSON
GR 91-41 - CAJON PIPELINE EIR
January 7, 1993
Page 2

* Appropriateness of the route alignment.
* Adequacy of the design for leak detection.
* Adequacy of the design to avoid rupture caused by seismic shaking.

We are also concerned that the most direct route from Santa Barbara to Long Beach has not been chosen as the preferred alternative. The subject proposal is a circuitous route. Apparently it has been proposed because of opposition to the more direct Pacific Pipeline route through the City of Los Angeles. Also, the current population density along the subject route is far less than the originally preferred Pacific Pipeline route. However, it appears that the seismic risks and risk of groundwater degradation are greater for the subject proposal. The risk of groundwater degradation and of seismic rupture must be mitigated to the maximum extent feasible by Best Available Control Technology and Best Management Practices. 46-4

Regarding specific concerns, we request coordination with the City's Fire District in the event of a pipeline emergency. The Rancho Cucamonga Fire Protection District would be called upon to respond in the event of a pipeline emergency, such as a rupture or spill, within the City. Government Code, Section 41015, requires each pipeline operator to provide each local Fire Department having suppression responsibilities with a map, or suitable diagram showing the location of the pipeline and a contingency plan for pipeline emergencies. Also, the operator shall offer to meet at least once each calendar year to discuss and review contingency plans for pipeline emergencies. Contact for the Rancho Cucamonga Fire Protection District is Lloyd Almand, Deputy Chief Fire Marshal, at (909) 987-6405. 46-5

Further we request that the following 12 items be more fully addressed in the Environmental Impact Report:

1. The specific route through the City of Rancho Cucamonga should be clarified further (Executive Summary (pages ES-1), 3-1). Maps 13 & 14 in Appendix A show the pipeline on the north side of I-15 from Summit Avenue (24th Street) to Arrow Route, then on the east side of Day Creek Channel to 4th Street. The text indicates the route south of M.P. 73 is "within public right-of-ways" which vary in width from 10 to 50 feet (pages 1-5, ES-1, 3-5). Will the pipeline be installed within Caltrans right-of-way? If not, there are about 30 private property owners along the route in addition to Southern California Edison (SCE) and the San Bernardino County Flood Control District (SBCFCD). South of Arrow Route will the pipeline be located in SBCFCD or SCE right-of-way? The SCE property ends about 3700 feet south of Arrow Route. Note that all of the properties south of the AT&SF railroad right-of-way contain railroad easements along their west property lines, adjacent to the SBCFCD property. Since Day Creek Channel has been completed in a straight alignment, is there a reason for the easterly jog shown on Map 14? 46-6

RESPONSE TO LETTER 46:

46-4 The Cajon Pipeline would be considerably shorter than the Pacific Pipeline since it would connect with an existing pipeline in the Barstow area and, therefore, would not need to cover the entire distance from Santa Barbara to Carson. The Cajon Pipeline has been proposed as an alternative by a separate company as a business endeavor and is not necessarily proposed in opposition to the Pacific Pipeline, although they are competing projects. Seismic risks can be reduced substantially through proper design and construction. The contamination of groundwater from a pipeline spill is considered only a remote possibility.

46-5 Comment noted. The pipeline operator will need to comply with all applicable regulations regarding emergency procedures, including proper coordination with local fire protection agencies. This will be incorporated into the Oil Spill Contingency Plan.

46-6 The precise alignment of the proposed pipeline has not been fully determined and is, therefore, subject to some possible modifications. The pipeline will not be located within Caltrans right-of-way, but instead will run adjacent to Interstate 15 in a right-of-way which will need to be acquired from private property owners, as well as Southern California Edison and the County Flood Control District. The "easterly jog" shown on Map 14 is correct. It circumvents an existing structure.

COMMENT LETTER 46: CITY OF RANCHO CUCAMONGA

MR. STEPHEN L. JOHNSON
GR 91-13 - CAJON PIPELINE EIR
January 7, 1993
Page 3

2. The City of Rancho Cucamonga will require an encroachment agreement and permits for each City street crossing, as is indicated in Table 1-2 (pages 1-9) Please revise Table 4.7.1-1 accordingly. 46-7

3. City policy does not permit total closure of any City street (page 5.10-1). We request that mitigation measure 5-10.1-1 (b) be amended as follows: 46-8

   The following crossings shall have a minimum of 2 lanes open in both directions at all times: Foothill Boulevard, Base Line Road, Arrow Route, and 4th Street. Two-way traffic shall be available at all times on Highland Avenue, Cherry Avenue, East Avenue, Etiwanda Avenue, and Miller Avenue (if the latter has been extended to meet Church Street).

4. The following facilities should be added to Table 4.10.1-1: 46-9

	Road	Jurisdiction
a.	Summit/24th St.	Rancho Cucamonga
b.	Cherry Avenue	Rancho Cucamonga
c.	Highland Avenue	RC, Caltrans
d.	Victoria Street	Rancho Cucamonga
e.	East Avenue	Rancho Cucamonga
f.	Base Line Road	Rancho Cucamonga
g.	Etiwanda Avenue	Rancho Cucamonga
h.	Miller/Church	Rancho Cucamonga
i.	Victoria Loop (fut)	Rancho Cucamonga
j.	Foothill Blvd.	RC, Caltrans
k.	Day Creek Blvd. (fut)	Rancho Cucamonga
l.	Arrow Route	Rancho Cucamonga
m.	Interstate 15	RC, Caltrans
n.	7th Street (fut)	Rancho Cucamonga
o.	4th Street	RC, Ontario

For your information, Figures IV-16 and IV-17 from the Industrial Specific Plan regarding the future 7th Street alignment are attached. The decision whether to bore or trench should be subject to independent review with each permit application. The pipeline will parallel Day Creek (incorrectly listed as "Dry" Creek) (page 4.10-4). 46-10

5. All three of the streams in this area listed on Table 4.2.1-1 (Etiwanda, Day and Cucamonga Creeks) are improved channels. Therefore, boring rather than trenching will be required. Day Creek Channel is now complete within the City of Rancho Cucamonga and the parallel Etiwanda/San Sevaine Channels are in place between Highland and Miller Avenues (pages 3-22 and 5.12-16). Please revise the mitigation measure accordingly (page 2-45) 46-11

RESPONSE TO LETTER 46:

46-7 Comment noted. Table 4.7.1-1 will be modified accordingly.

46-8 Comment noted. Pipeline construction will comply with all feasible construction-related regulations of the local jurisdictions where construction activities will occur. Details of construction scheduling, detours, lane closures, restriping, and other measures required for construction at individual locations will be worked out with local jurisdictions after the alignment has been finalized and construction plans have been prepared. Mitigation measure 5.10.1-1 (b) has been revised as follows:

5.10.1-1(b) *On roadways where trenching shall occur within the roadway right-of-way, one travel lane shall be left open in each direction, delineated by temporary traffic cones/barricades. For minor collectors and neighborhood streets, one lane shall be left open with signal persons to direct through traffic. These street closures shall occur in coordination with city staff from each jurisdiction. Specific locations where two-way traffic is required shall be identified in consultation with City staff.*

46-9 Comment noted. Table 4.10.1-1 will be modified to include the additional streets listed.

46-10 Comment noted. This spelling has been corrected.

46-11 Comment noted. References to trenching of Etiwanda Creek, Day Creek, and Cucamonga Creek have been corrected to reflect crossings which shall be bored not trenched. Please note that the pipeline will be parallel to Day Creek for some length. It will be placed by trenching within the flood control right-of way. Mitigation measure 5.12.1 (b) (iii) is intended to ensure that the pipe has sufficient strength to prevent any potential for failure at these particular locations. For the location adjacent to Etiwanda Creek percolation basins the pipe shall be bored and inserted inside a casing pipe or trenched and concrete coated dependent upon the result of consultation with the San Bernardino County Flood Control District. Refer to mitigation measure 5.12.1-1(b) iii.

5.12.1-1(b) iii. *The pipeline will be concrete coated at crossings of Cajon Wash (M.P. 72), Los Angeles River (M.P. 135.7), and San Jose Creek (M.P. 110.1 - 117.2), to help reduce the risk of oil spill effects on significant water supplies and biologically sensitive areas.*

COMMENT LETTER 46:
CITY OF RANCHO CUCAMONGA

MR. STEPHEN L. JOHNSON
GR 91-73 - CAJON PIPELINE EIR
January 7, 1993
Page 4

6. The attached Etiwanda/San Sevaine Area Drainage Policy Index Map shows the proposed master plan storm drainage facilities in the vicinity. The SBCFCD may have special design considerations for the existing Victoria and San Sevaine basins, which abut the I-15 Freeway on the north side. The only Master Plan Storm Drain shown on the exhibit which is currently in place is the one in Base Line Road west of the I-15 Freeway, and it drains to a temporary facility. The pipeline crossings of all city streets shall take into account future storm drain locations. The pipeline will also need to be designed around a Metropolitan Water District (MWD) storm drain/overflow culvert in Arrow Route east of I-15 which discharges to Day Creek Channel. Accordingly, please revise Mitigation Measure 5.2.1-2. Include SBCFCD and MWD in the Responsible Lead Agency column. 46-12

7. The area north of the I-15/SPRR crossing is in a Flood Zone D (undetermined, but possible, flood hazard). 46-13

8. Depending upon funding availability, the City may have our Foothill Boulevard (Route 66)/I-15 interchange project under construction in 1994 or 1995. Coordination will be required. Accordingly, please add to the section "Relationship to Other Projects (pages 3-40 and 3-42). 46-14

9. Caltrans should be contacted regarding design constraints relative to the SR 30/I-15 interchange (future 210 freeway), to be constructed in the vicinity of the existing Highland Avenue overpass. We understand that phase I of that project will include replacing the Cherry Avenue ramps with ramps and an overpass at Summit Avenue (24th Street). If the pipeline is to be routed around freeway ramps, be advised that Caltrans may have plans to enlarge the Base Line Road ramps and/or expand their park and ride facility at that location. The existing trapezoidal channel which parallels the I-15 on the north side between Miller Avenue and Arrow Route shall also be taken into consideration. Accordingly, please add to the section, "Relationship to Other Projects" (pages 3-40 and 3-42). 46-15

10. Four of the eight industrial properties which front Sante Anita north of 4th Street and back onto the Day Creek Channel right-of-way already have approved site plans, two of which have been constructed. There is also one developed property about 1200 feet south of the railroad tracks. Accordingly, please add to the section, "Relationship to Other Projects" (pages 3-40 and 3-42). 46-16

11. The Southern California Regional Rail Authority (SCRRA) should be one of the reviewing agencies since they have purchased both AT&SF and SPRR lines for use on the Metrolink system (pages 8-7). 46-17

12. The noise study incorrectly lists a Slosmek High School. Is this reference to Etiwanda Intermediate School located on Etiwanda Avenue, south of Victoria Street? Please revise accordingly (pages 4.5-6, 4.7-4, and 4.7-11). 46-18

RESPONSE TO LETTER 46:

The pipeline bored under the California Aqueduct shall be installed inside a casing pipe within DWR's right-of-way. The casing pipe and the pipeline shall be cathodically protected and dielectrically isolated from each other. In addition, the pipeline shall be dielectrically coated and sealed to the casing by the use of a link seal or equivalent. A 2-inch I.D. drain line shall be provided for at the low end of the casing pipe, sloped towards daylight, and away from the Aqueduct. A 3-inch standard weight galvanized steelguard post shall be installed adjacent to each drain line. The post shall extend three feet above the ground and 18-inches below ground. The bottom of the post shall be embedded in at least one cubic foot of concrete.

The pipeline shall be either concrete coated or installed inside casing pipe adjacent to the Etiwanda Creek percolation basins. The design of the pipeline at this location shall be finalized following consultation with the San Bernardino County Flood Control District.

46-12 Comment noted. Coordination with San Bernardino County Flood Control District will be needed with regard to crossing the Victoria and San Sevaine drainage areas (as well as the Etiwanda Creek basin) in order to avoid interference with the function of these basins. Coordination with the Metropolitan Water District will also be required with regard to the storm drain/overflow culvert mentioned, as well as other facilities along the route of the pipeline. Mitigation measure 5.2.1-2 will be expanded to refer to coordination with these agencies.

46-13 Comment noted. This will be taken into consideration in finalizing the pipeline alignment and preparing construction plans.

46-14 Comment noted. The pipeline company will need to provide notice of its proposed construction activities to local agencies in advance. Local agencies will also be provided additional information on construction details and scheduling prior to commencing construction. Refer to mitigation measure 5.8.1-1 (b). The interchange project have been added to the "Relationship to Other Projects" section of the EIS/EIR.

COMMENT LETTER 46:
CITY OF RANCHO CUCAMONGA

MR. STEPHEN L. JOHNSON
GR 91-13 - CAJON PIPELINE EIR
January 7, 1993
Page 5

In conclusion, local impacts must be fully mitigated. Further, risk of ground water contamination and of seismic rupture must be minimized to the maximum extent feasible using existing technology. 46-19

If you have any questions, please contact me, Betty Miller, Associate Engineer, or Miki Bratt, Associate Planner, at (909) 989-1861.

Sincerely,

Rick Gomez
Community Development Director

RG:MB/jfs

Attachments

cc: L. Dennis Michael, Fire Chief
Joe O'Neil, City Engineer
Brad Buller, City Planner

RESPONSE TO LETTER 46:

46-15 Comment noted. Coordination with Caltrans will need to occur with regard to the project referenced and several other projects and crossings before the pipeline can be constructed. The SR 30/I-15 interchange project will be added to the "Relationship to Other Projects" section of the EIS/EIR.

46-16 Comment noted. The industrial properties with approved site plans have been added to the "Relationship to Other Projects" section of the EIS/EIR.

46-17 Comment noted. The Southern California Regional Rail Authority will need to be contacted and consulted with regard to the alignment and design of the pipeline where it crosses or otherwise affects the Metrolink rail system.

46-18 Etiwanda Intermediate School was incorrectly referenced. This has been corrected in the Final EIS/EIR.

46-19 Comment noted. Responses to these concerns are addressed in previous responses.

COMMENT LETTER 47:
MR. AND MRS. C.C. WARD

January 12,1993
BALDY MESA, CA

BLM HEARING OFFICER, STEPHEN JOHNSON
6221 BOX SPRINGS BLVD.
RIVERSIDE,CA 92507

DEAR SIR:

To my knowledge, this is the first printing of the intended oil pipeline to be constructed on Baldy Mesa Rd. As you know, this road is already saturated with lines of all varieties incl. a natural gas pipeline that we cannot even hook onto. The way the new hot oil pipeline would be placed would really be a raging inferno when we have the "BIG ONE" that is predicted in the very near future. We are 20yr pioneers of this area and have watched numerous scams perpetrated legally and illegally! We have been in the land business here all this time and have been keenly aware of what is happening to what was once a lovely Valley. All of this for money to line some speculators pockets. 47-1

My main question I would like to ask is why is it always Baldy Mesa RD. and not #395 or White RD that paralells this highway. We moved here when this was still just a rough dirt road and very few houses. Now we have worked hard to acquire a beautiful Grammar school that has over 800 students. Of course that means there are half that many parents who live in this area. 47-2

I can readily understand why Adelanto is eager for such a venture. They stand to gain monetarily. All this will do to Baldy Mesa is devalue our land and put us a'a terrible risk of our lives considering all #f the quakes we have been having and no doubt will have in the future. A combined oil spill mixed with a broken gas line when the earth cracks open as it did in Tucca Valley will be certain death for all of us. I hope that you will take this into consideration more so than what the speculators of the NUCLEAR WASTE DUMP are planning for the WARD(no relation) Valley. Of course the real reason is to make money for Speculators who could care less since they do not live on the desert. 47-3

I only sincerely hope that someone who "cares" will take time to listen to us, who have lived on the High Desert for many years. Before it is too late, that is. Thank you for listening and help you can give. 47-4

YOURS TRULY,

MR.and MRS. C.C. WARD
11120 BALDY MESA RD.
PHELAN, CA 92371

RESPONSE TO LETTER 47:

47-1 The public hearing for the project were noticed pursuant to requirements of both the California Environmental Quality Act (CEQA) and the Bureau of Land Management Guidelines to NEPA.

47-2 The route which has been proposed was chosen after review of the most appropriate route over the Cajon Pass and in consideration of engineering design. Alternative routes discussed in the Draft EIS/EIR were located further to the east, however they posed greater potential environmental impacts.

47-3 Collocation danger is analyzed in Section 5.8 and System Safety is analyzed in Section 5.12 of the Draft EIS/EIR.

47-4 Comment noted.

COMMENT LETTER 48:
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

South Coast
AIR QUALITY MANAGEMENT DISTRICT
21865 E. Copley Drive, Diamond Bar, CA 91765-4182 (909) 396-2000

January 19, 1993

Stephen L. Johnson
United States Department of the Interior
Bureau of Land Management
California Desert District Office
6221 Box Springs Blvd
Riverside, CA 92507-0714

Dear Mr. Johnson:

RE: The Draft Environmental Impact Report For the Cajon Pipeline Project

SCAQMD# SBC921281-01

The South Coast Air Quality Management District (SCAQMD) has reviewed the air quality component of the Cajon Pipeline Project Draft Environmental Impact Report (Draft EIR). The SCAQMD believes that the construction and operation of the proposed project will create individual and cumulative project related air quality impacts during each phase of the proposed project. The SCAQMD has, therefore, taken this opportunity to identify the type of information which should be included in the air quality discussion for a project of this nature. It is our belief that the following general guidance will be helpful in assisting you to prepare a meaningful air quality analysis section for the final environmental document. 48-1

Existing Setting

The air quality section should include the number of days, quarters or months, or number of samples, the selected monitoring stations exceeded the state and federal air quality standards along the length of the pipeline, utilizing the most recent three years of data. 48-2

Demolition, Remediation and Construction Related Air Quality Impacts

The Final EIR should address whether or not any structures or equipment (storage tanks, pipelines, etc.) will be disturbed, demolished or removed along the length of the pipeline. Given the nature of the operation, demolition of such structures could pose the risk of emissions of asbestos or other toxic contaminants. Those risks and their potential impacts should be discussed in the Final EIR. 48-3

The Draft EIR (page 6-6) states that construction will cause traffic disruption and congestion on existing roadway segments and intersections. The Final EIR should analyze the potential impact of this traffic disruption and congestion on air quality and microscale carbon monoxide (CO) levels. 48-4

RESPONSE TO LETTER 48:

48-1 Comment noted. Individual comments are addressed in the following responses.

48-2 Four representative stations have been used to characterize the two air basins in which the pipeline route is located (Table 4.4.1-4 and 4.4.1-5). The EIS/EIR preparers felt that this adequately demonstrates the number of days which standards would be exceeded. At the time of preparation of the document 1990 data was the most recent available.

48-3 Project implementation will not require disturbance, demolition or removal of any structures.

48-4 Analysis of traffic impacts of the Cajon Pipeline project did not go to the level of detail of reviewing level of service and level of service decreases for individual intersections. The information required to undertake a microscale (CO) analysis is not available at this time. To approximate an answer to your comment would require assumptions and speculation as to level of impact. Given that the disruption at each intersection is temporary in the matter of three to five days, it is has been determined that this level of analysis is not necessary for the level of impact evaluated.

COMMENT LETTER 48:
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Emissions Estimation

Since Technical Appendix II was not included in the Draft EIR, it is not possible for the SCAQMD to verify if all emission sources were analyzed in the Draft EIR. All emission sources should be identified and quantified. Emissions of criteria and toxic pollutants from all construction and operations should be included. 48-5

Pre- and Post-Mitigation Project Significance

The Draft EIR has contradicting information and statements regarding pre- and post-mitigation project significance. Page 5.4-2 of the Draft EIR indicates that the construction and operation related daily impacts will exceed SCAQMD significance thresholds and mitigation measures will be employed to reduce emissions below the thresholds. Despite that conclusion, the Draft EIR states that mitigation measures are not required for the proposed project because the level of significance of air quality impacts is "less than significant with mitigation measures." The Final EIR should clarify whether the project will or will not exceed the significance thresholds. If the thresholds are exceeded, mitigation measures must be included in the Final EIR. 48-6

Health Risk and Odor Nuisance

The sensitive receptor analysis should identify schools, hospitals and long-term care facilities within the vicinity of the proposed project. The wind patterns in relation to identified sensitive receptors should also be included. It would be appropriate to include a discussion of how the proposed project will comply with the Rule 212 and AB 3205 notification requirements. 48-7

An accidental oil leak and spill will release toxic air pollutants. Mitigation measures to deal with such a release are not identified and alleged not to be required. If the potential for a release of toxic air contaminants exists then feasible mitigation should be applied. The Final EIR should include mitigation measures that will reduce chances of accidental leaks and spills, such as installation of leak detecting pigs, use of cathodic coatings etc. Leak eliminating and detecting methodologies should be included as a part of the project design. 48-8

The Draft EIR (page 5.4-4) states that the pipeline operation will result in fugitive or diurnal emissions along the length of the pipeline. The Final EIR should identify toxic air contaminants that may be emitted from diurnal or fugitive emissions. The impact of those emissions on sensitive receptors located along the length of the pipeline should be discussed. The Final EIR should also address emissions associated with maintenance or fluid change-over related pipeline clean-up procedures. 48-9

The health and safety risks associated with the use, storage or transportation of any chemicals should be assessed. The assessment should include quantification of potential toxic air contaminants and PM10 from various operations. Modeling for health risk analysis must address ground-level impacts from the proposed project. SCAQMD's PM10 State Implementation Plan for the Coachella Valley should be consulted on the adverse health effects associated with exposure to airborne PM10. Supplemental Guidelines for Preparing Risk Assessment to Comply with the Air Toxic "Hot Spot" Information and Assessment Act, Assembly Bill (AB) 3588, and Analysis of Ambient Data from Potential Toxic "Hot-spots" in the South Coast Air Basin may be used for health risk analysis. SCAQMD's modeling staff (Tom Chico (909) 396 - 3140) may be contacted to obtain more information on performing health risk and odor analysis. Mitigation measures should be included to reduce potential health risk to the maximum extent feasible. 48-10

RESPONSE TO LETTER 48:

48-5 The Technical Appendices include an Air Quality analysis. Technical appendices are provided upon request. The technical appendices will be forwarded to the SCAQMD for review.

Following additional comments by the District the air quality analysis and emission calculations have been revised. This analysis now includes a preliminary toxic pollutant evaluation. This information has been summarized in Chapter 5.4. This analysis does not include releases from abandonment. Activities such as abandonment will require further review by the overseeing agency and if necessary at that time these calculations would be completed. Additionally a health risk assessment has not been completed due to the significance of toxic releases.

48-6 The approach to assessment of air quality impacts assumed that air quality impacts would be significant but that mitigation measures which would be included in construction and normal operations would be included within the definition of the project. For this reason, air quality impacts would be reduced to a level of insignificance. Due to the response of the Air Quality Management Districts involved, this section has been revised to reflect that the impact is significant and mitigation measures are required.

48-7 Sensitive air quality receptors are the same as identified for sensitive noise receptors. These are listed in Table 4.5.1-4.

48-8 An oil spill would result in the release of volatiles to the atmosphere. Some approximation of toxics has now been included in the analysis. This information would provide some background as to releases which would occur in the event of pipe failure. Air quality impacts due to an oil spill are assessed in Impact 5.4.1-3. The proposed project includes measures to reduce the potential for an oil spill and leak detection equipment. These components of the project are described in sections 3.2 and 5.12.

48-9 Refer to response to Comment 48-5.

48-10 Refer to response to Comment 48-5.

COMMENT LETTER 48:
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Cumulative Impact Analysis and Consistency Analysis

The cumulative analysis included in the Draft EIR is not adequate. Cumulative air quality emissions from similar and related projects should be assessed. The project's consistency with various regional plans (Air Quality Management Plan, General Plan, etc.) that address air quality issues should also be demonstrated. 48-11

Mitigation Measures

It is the opinion of the SCAQMD that the proposed project has the potential to create adverse air quality impacts which have not been adequately identified or mitigated. The Final EIR should include mitigation measures to reduce the adverse air quality impacts from construction and operation of the proposed project to the maximum extent feasible. Attached are a few standard mitigation measures which could be applied as appropriate (Attachment I). The Final EIR should identify the level of construction and operation related emissions which will remain after the implementation of selected mitigation measures. In order to determine post-mitigation project significance, quantitative analysis of mitigation measures should be performed where feasible. Where quantification is not feasible a qualitative analysis should be done. The Draft EIR does not include such an analysis, nevertheless, the Draft EIR concludes that the project is less than significant after the implementation of mitigation measures. That conclusion must be substantiated. 48-12

Conclusion

The above comments are intended to assist you in the preparation of a thorough air quality analysis in satisfaction of the requirements of the California Environmental Quality Act (CEQA). Please keep in mind that the above is only a summary of the air quality factors which should be included in your environmental analysis. For additional information, please refer to the SCAQMD's 1987 Air Quality Handbook for Preparing Environmental Impact Reports. The SCAQMD is in the process of revising its air quality impact analysis handbook. If you desire, the September 1992 Draft CEQA Air Quality Handbook can be made available to you. To further assist you in preparing your air quality analysis we have attached a listing of references (Attachment II). In addition, the SCAQMD staff would be happy to assist you during the revision of your air quality section. 48-13

Sincerely,

Cindy Greenwald
Planning Manager
Planning and Technology Advancement

CSG:CAD:SRG
(SGICFLDOC)

RESPONSE TO LETTER 48:

48-11 Refer to response to Comment 14-1.

48-12 The SCAQMD's comment is noted. Please refer to response to Comment 48-6.

48-13 Comment noted.

COMMENT LETTER 49:
CALIFORNIA DEPARTMENT OF EDUCATION

CALIFORNIA DEPARTMENT OF EDUCATION
School Facilities Planning Division, Suite 1014
601 West Fifth Street, Los Angeles, CA 90071-2073

Bill Honig
Superintendent
of Public Instruction

January 22, 1992

Dee Dorval, City Engineer
City of Adelanto
P.O. Box 10
Adelanto, CA 92301

Dear Mr. Dorval:

This is regarding the proposal by the Cajon Pipeline Company to the City of Adelanto to build a 142 mile long pipeline from 12 Gauge Lake to Carson and Long Beach with two pump stations, one located in Adelanto along with a control and maintenance facility.

The Snowline Joint Unified School District has informed me that the Cajon Pipeline Project would be adjacent to a school site. This could pose an imminent danger to students and staff in the event of pipe failure. Current law prohibits a school site to be acquired if a pipeline other than distribution lines hazardous wastes traverses the site. Our policy extends that to adjacent pipelines adjacent to proposed school sites that carry hazardous wastes as a prudent avoidance effort. Likewise, we would hope that other public agents would follow the same. We request that your policy consider moving the Cajon Pipeline Project to an alternate location to avoid any health or safety threat to students or staff. 49-1

Sincerely,

Betty Hanson

Betty Hanson, Ed.D., Consultant
School Facilities Planning Division
California Department of Education

BH/jsb

RESPONSE TO LETTER 49:

49-1 Comment noted. The Baldy Mesa Elementary School was identified as a sensitive receptor in the environmental analysis. The proposed pipeline route has been re-routed around Baldy Mesa Elementary School in order to mitigate any potential impacts (reference Appendix A Sheet 8).

COMMENT LETTER 50:
SNOW LINE JOINT UNIFIED SCHOOL DISTRICT

SNOW LINE JOINT UNIFIED SCHOOL DISTRICT EST. 1982 P.O. Box 1158 • Phelan, CA 92371 • 619-868-5217

January 22, 1993

Dee Dorval, City Engineer
City of Adelanto
P. O. Box 10
Adelanto, CA 92301

Dear Mr. Dorval:

This is regarding the proposal by Cajon Pipeline Company to the City of Adelanto to build a pipeline from 12 Gauge Lake to Carson and Long Beach.

Please be advised that the Snowline Joint Unified School District has 699 elementary students attending Baldy Mesa Elementary School. The location of Baldy Mesa Elementary is 10376 Baldy Mesa Road.

It is the understanding of the Snowline District that the proposed pipeline would be located on Baldy Mesa Road. This could pose an imminent danger to students and staff in the event of pipe failure. 50-1

The Snowline Joint Unified School District is requesting your consideration of moving the proposed pipeline to an alternate location to avoid any potential health or safety threats to students or staff.

Sincerely,

David Nilsen
Facilities Planner

DN/jlp

RESPONSE TO LETTER 50:

50-1 Comment noted. The concerns of the school district have been considered. The Cajon Pipeline has been re-routed around Baldy Mesa Elementary School in order to mitigate any potential impacts (Ref. Appendix A Sheet 8).

COMMENT LETTER 51:
PACIFIC PIPELINE SYSTEM, INC.

PACIFIC PIPELINE SYSTEM, INC.

1727 Mesa Verde Avenue, Suite 101 • Ventura, CA 93003 • (805) 658-0742
12201 East Arapahoe Road, Suite C-10• Englewood, CO 80112 • (303) 793-2535

January 27, 1993

Mr. Stephen Johnson
U.S. Department of Interior
Bureau of Land Management
6221 Box Spring Blvd.
Riverside, CA 92507

Ms. Pat Chamberlaine
City Manager
City of Adelanto
Adelanto, CA 92301

RE: Cajon Pipeline Draft EIS/R Technical Appendices

Dear Mr. Johnson and Ms. Chamberlaine:

On January 5, 1993, Pacific Pipeline System, Inc. ("Pacific") submitted its comments on the Cajon Draft Environmental Impact Statement/Report ("Cajon DEIS/R"). In that letter, as well as in another letter sent under separate cover that same day, Pacific indicated that due to the lack of availability of the Cajon DEIS/R Technical Appendices, Pacific had been unable to complete its analysis of the appendices by the January 5, 1993 comment period deadline. Pacific indicated in those earlier letters that the technical appendices were not available for public review until December 28, one week prior to the close of the 60-day public comment period. The lack of availability of the technical appendices until December 28 has denied the public a sufficient opportunity for input and therefore has precluded the level of public review required by CEQA. San Sutter Sensible Planning, Inc. v. Sutter City Board of Supervisors, 122 Cal.App.3d 813, 176 Cal.Rptr. 340, 343 (1981). Moreover, "CEQA requires an EIR to reflect a good faith effort at full disclosure." Kings County Farm Bureau v. City of Hanford, 221 Cal.App.3d 692 (1990). Providing the public with only one week to review voluminous and highly technical appendices does not represent a good faith effort at full disclosure. Indeed, it is considered a prejudicial abuse of discretion when an agency's "failure to include relevant information precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process." Sutter Sensible, 176 Cal.Rptr. at 347-48. Because the technical appendices are an integral component of the DEIS/R, Pacific earlier indicated, and reiterates herein, that the unavailability of the technical appendices is a significant procedural flaw that can be corrected only by extending the public review period for an additional five weeks beyond January 5, 1993. This time is needed to allow concerned parties to review the technical appendices, integrate this review with the review of the DEIS/R itself, and submit meaningful comments on the technical appendices. 51-1

Below are Pacific's specific comments on the Technical Appendices. Pacific submits these comments with the understanding that they are to be included as part of the record in this matter. For the convenience of the reader, each comment includes a specific page and paragraph number reference to the Cajon DEIS/R Technical Appendices.

Appendix I. Biological Evaluations/Biological Assessment

General Comment Regarding Overall Biological Evaluation/Assessment

The Biological Assessment/Biological Evaluation fails to include information concerning the relative amounts of upland habitat that would be disturbed by project implementation. It also lacks any description of stream crossings. None of the field surveys (all reports in Appendix I), that were conducted to identify populations of sensitive species, covered an appropriate study area. As an example, the report included in 51-2

RESPONSE TO LETTER 51:

51-1 The public review period for the Draft EIS/EIR extended from November 20, 1992 to January 5, 1993. This period of review was extended due to late receipt of some comments

The requests for appendices was received in December 1992. Copies of the Technical Appendices were made available within seven working days of the request.

51-2 Upland habitat is delineated by milepost along the pipeline route. Approximate acreages which would be disturbed due to clearing of the right-of-way were given in response to Comment 35-79. The intent of the Biological Assessment/Evaluation is not to describe stream crossings but to describe sensitive vegetation and wildlife. Stream crossings are described where they relate to the occurrence of sensitive species. Review of species occurrence along the entire pipeline route was undertaken. The pipeline is located within road rights-of-way and flood control levees from M.P. 74 and would not result in the disturbance of any natural areas.

COMMENT LETTER 51:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 27, 1993

Appendix I, Tab A states that field surveys for botanical resources were conducted in the northern half of the pipeline route (to Lytle Creek). (See Appendix I, Tab A, Page 1, Scope.) There is no indication, however, that the entire line was surveyed and therefore there is no assurance that all sensitive species potentially occurring within the zone of impact were adequately identified. 51-2

Draft Biological Evaluation/Biological Assessment (Included after Tab I, and Before Tab A)

Page 6, Second Full Paragraph thru Table 1, Pages 7-10

The text mentions a total of 82 sensitive plant species potentially occurring along the pipeline route. However, Table 1 lists only 66 plant species. In addition, the report fails to identify (in either of the rare plant surveys), the following sensitive plant species which may potentially occur within the project area: 51-3

Species	Status (FED/STATE/CNPS)
Hemizonia arida	C1/R/1B
Phacelia ancholei	C3c/--/2
Selerocactus polymiscerus	C3c/--/4

Pages 15-28, Mitigation Measures

The discussion of the mitigation measures should clearly identify objectives, describe technical procedures, provide criteria for evaluating success, and discuss the expected effectiveness. The discussion in the Cajon report, however, is cursory, and suggests only a direction for impact mitigation. For example, while the difficulty in restoring desert habitats historically has been a problem, the mitigation measure for desert revegetation (Measure Number 16, at Page 19) is incomplete, stating only that "native species shall be used to revegetate areas disturbed by the project." The report does not provide specific seed prescriptions. The appropriateness of any seed mix is founded upon the species composition, the site specificity of the mix, the use (or exclusion) of non-native annual crops, and the rate of application. Since the mixes remain unspecified, a determination of the expected effectiveness of the mitigation cannot be made. 51-4

Tab. A. Botanical Survey of Proposed Cajon Pipeline Right-of-Way (1992); and Cajon Pipeline Project Botanical Survey, 13-Gauge Lake Tank Farm Site to Cajon Wash, California

General Comments

The two rare plant surveys (reported in Tab A) appear to have studied a relatively narrow study area or impact zone, and are insufficient to document a 70-foot or wider area of construction disturbance. In addition, both surveys focused only on undisturbed areas and did not address locations where the proposed route will follow existing roads. Since the Cajon pipeline right-of-way will be 70 feet, large areas outside of existing roads will be disturbed and therefore should have been studied. 51-5

Tab. B. Biological Resources Assessment for the Proposed Cajon Pipeline Route, San Bernardino County, California: Birds

Page 15, Section 4, Paragraph 1

While the report notes that brood parasitism by brown-headed cowbirds is significant in the riparian areas traversed by the pipeline, it does not suggest a control program as a mitigation measure. Decreasing densities of the brown-headed cowbird by trapping and removal have proven successful in increasing recruitment rates for sensitive bird species such as Bell's vireo. 51-6

RESPONSE TO LETTER 51:

51-3 See response to Comment 35-84.

51-4 Mitigation measures were defined in coordination with specialists of the BLM and USFS. These mitigation measures will be further defined in consultation with the CDFG and USFWS. Comments pertaining to revegetation are addressed in responses to Comments 35-91 and 35-116.

51-5 The botanical surveys undertaken required extensive pedestrian survey of the entire 70 foot right-of-way. South of Baldy Mesa, the right-of-way within roadways will not disturb areas outside of the public road right-of-way.

51-6 Brood paratism is not an impact of pipeline construction or operation.

COMMENT LETTER 51:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 27, 1993

Tab. C. Second Report: Estimated Distribution and Density of the Desert Tortoise and Habitat Evaluation for the Mohave Ground Squirrel for a Proposed Heated Oil Pipeline Near Kramer Junction, California

Page 8, Paragraphs 1-4

The report states that the pipeline right-of-way between MP 0 and 14.5 is non-compensable habitat for the Mohave Ground Squirrel, but does not provide an adequate description of the condition of the pipeline right-of-way between MP 14.25 and 25.8. Is that segment compensable or non-compensable habitat for this species? 51-7

Additionally, the text of the report references "Appendix 3" and "Appendix 4" to the report, but those appendices (as well as other appendices noted elsewhere in the report) are not included with the report in the Technical Appendix. 51-8

Tab. D. Final Report, Assessment of the Fishes, Amphibians, and Reptiles of the Cajon Pipeline

Page 16, Direct Impacts, # 1 and Mitigation Paragraphs

Habitat restoration alone will not restore a disturbed site to even a semblance of its pre-construction condition unless topsoil is stockpiled and carefully replaced. Standard pipeline excavation and backfilling techniques are likely to significantly destroy the original soil structure within the pipeline right-of-way. This may decrease or inhibit the ability of burrowing amphibians and reptiles, such as spadefoot toads and legless lizards, to recolonize the pipeline right-of-way. What are the specific mitigation techniques proposed by Cajon to ensure mitigation effectiveness? 51-9

Pages 19-20, Indirect Impacts, Number 8

Pipeline failure anywhere within the vicinity of Cajon Wash/Lytle Creek would create the possibility of surface water or groundwater contamination. The report indicates that surface water within Cajon Creek is sporadic and assumes that pipeline failure within dry portions of the creek will pose little threat to wildlife. (See top of Page 20.) However, as is typical of most southern California watercourses, Cajon Wash probably maintains a large subsurface flow. In the event of pipeline failure, this water would likely be contaminated and function as a vehicle for downstream hydrocarbon transport, which could significantly impact downstream aquatic resources. What mitigation is proposed for oil spills if water is flowing? What measures are proposed to protect groundwater flows? 51-10

Page 21-22, Potential Impacts on the Speckled Dace

Although the "main speckled dace population" is located upstream from the proposed pipeline right-of-way, small downstream populations are important in maintaining genetic heterogeneity in this species. The report implies that impacts to these small populations resulting from pipeline failure would be insignificant. What would be the impacts and what would be the mitigation? 51-11

Page 24, Potential Impacts on Coastal Western Whiptail

The impact assessment identifies significant impacts on the coastal western whiptail. What would be the specific techniques and criteria for success for the habitat restoration plan? Why did the mitigation not consider construction during the whiptail's inactive seasons? 51-12

RESPONSE TO LETTER 51:

51-7 The pipeline ROW between MP 14.25 and 25.8 is not proposed as non-compensable. As required by the California Department of Fish and Game, existing impacts on the ROW were assessed and a Cumulative Habitat Evaluation Ranking of 22 was determined. This means that the habitat has been moderately affected by a variety of impacts.

51-8 Appendices 1 through 4 were not contained in the public distribution of the Draft EIS/EIR due to the sensitive nature of information pertaining to endangered species locations.

51-9 Topsoil treatment and segregation is addressed in mitigation measures within the biological assessment/evaluation. Refer to page 17 of that technical report,

51-10 Impacts and mitigation for oil spills are addressed in the Draft EIS/EIR.

51-11 Pipeline failure impacts are addressed in Mitigation Measure 8 of this appendix.

51-12 A mitigation monitoring program will be implemented after restoration has been completed. This plan will be designed to evaluate recolonization of the project area by the whiptail, and will include biannual field surveys, conducted over a five year period. Criteria for successful recolonization will be focused chiefly on the abundance and distribution of whiptails in the study area and adjacent habitats during the monitoring period.

During the period of inactivity (winter), whiptails will continue to be present in underground burrows along the construction corridor. Construction during this period would likely result in the destruction of whiptails that are hibernating. the number of whiptails lost to construction activities during the winter would probably be greater than those lost during the active season, because active whiptails are capable of fleeing the construction site, whereas dormant whiptails are not.

COMMENT LETTER 51: PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 27, 1993

Page 26, Potential Impacts on the Zebra-Tailed Lizard

The report indicates that conducting construction and installation during seasonal inactivity of the zebra-tailed lizard would reduce construction impacts to this species. Because burrows of this species are small and difficult to distinguish from those of other common terrestrial lizards, marking and avoiding zebra-tailed lizard burrows would not be feasible. It would be more appropriate to schedule construction during the surface activity periods of this species, so that construction monitoring could detect and remove them from the right-of-way. What seasons are proposed for construction? What are the specifications for habitat restoration? What are the criteria for successful restoration? 51-13

General Comments

The distillation of the information in the report into the main body of the DEIS/R is not reflective of the level of effort of the original vertebrate resource surveys. The summary of methods and results provided in the DEIS/R is inadequate; the information it provides is insufficient for purposes of preparing an impact assessment. 51-14

The riparian habitats and other natural habitats in the Los Angeles Basin were not studied. The flood control segments of the right-of-way, such as at Whittier Narrows, Rio Hondo or San Jose Creek, may contain riparian habitats. Also, the segment of pipeline in common with Mojave Pipeline was not studied; will Cajon's area of disturbance coincide with Mojave Pipeline exactly? Would there be any indirect impacts outside Mojave's right-of-way? 51-15

Appendix II. Air Emissions Calculations

General Comment

The air quality analyses are premised on a series of assumptions concerning construction schedule, equipment, and techniques. Many of these assumptions are erroneous and render the analysis incorrect. For example, the schedule for the pipeline is infeasible. It provides for final design concurrent with construction start, and calls for ordering pipe (January 1, 1993) only six weeks prior to construction start. Line pipe of this nature, however, requires longer than six weeks ordering time; it takes at least three months to roll, coat, insulate and jacket the pipe.

Moreover, the fact that the pipe ordering is to take place prior to permit approval raises the issue of whether Cajon has the funding necessary to order pipe. This investment would likely exceed $25 million. Who would invest such funds in pipe prior to permit approval, especially in California? 51-16

Page 1, Section 1, Paragraph 1, Air Emissions

This section discusses that there is approximately 75 miles of rural construction and 55 miles of urban construction. This totals to 130 miles of pipeline. The project description indicates that the line length is 142 miles. 51-17

Page 1, Paragraph 5

The trenching rates given (3000 feet/day in rural areas and 500 feet/day in urban areas), are inconsistent with the estimated construction progress (2.5 to 3 miles/day in rural areas and 0.5 miles/day in urban areas). Furthermore, these construction progress rates are inconsistent with the rates stated on Page 3-25 of the DEIS/R (1.5 miles/day in rural areas and 0.25 miles/day in urban areas). Assuming the ditching crew precedes the stringing, welding, lowering in and backfill crew, the ditching crew would leave extensive areas of open ditches. The overall construction would program at 13 to 16 times the rate of ditching. Also, the Technical Appendix estimates the total project work days as approximately 9 calendar months, while the 51-18

RESPONSE TO LETTER 51:

51-13 Focused survey for the zebra-tailed lizard will be required to determine population demographics and to locate burrows. Following this survey and in consultation with the CDFG and USFWS appropriate mitigation measures of those recommended will be completed.

51-14 The CEQA Guidelines require that the EIR should be "analytic rather than encyclopedic", (Guidelines, Section 15006). Information was summarized in the Draft EIS/EIR from these technical reports. These technical reports for biological resources will be the basis for review by the CDFG and USFWS and it was not necessary to include more information for the assessment of biological impacts in the Draft EIS/EIR.

51-15 For response to comments regarding surveys of the Los Angeles Basin, refer to response to Comment 51-2. The construction of the pipeline adjacent to the Kern River-Mojave Gas Pipeline will not disturb areas outside of the delineated right-of-way.

51-16 Refer to response to Comment 35-43.

51-17 The length of the pipeline route has been corrected.

51-18 The rates of construction have been corrected. In the appendix to be consistent with Chapter 3 total project work days is now estimated at 235. This does not take into consideration simultaneous activity.

COMMENT LETTER 51:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 27, 1993

DEIS/R at Page 3-25 estimates 12 months. These inconsistencies should be corrected as the figures are important for determining total project emissions. 51-18

Also, how many intersections will be trenched? What would the linear distance be? How many days total would be involved? 51-19

Page 1, Paragraph 6

The report indicates that emission rates are based primarily on emission factors for AP-42. However, the report does not indicate which AP-42 factors were used. Table 1 provides equipment data but does not provide emission factors. Emission factors should be provided so that the reasonableness of the emissions estimates can be assessed. 51-20

The report fails to provide estimates for project total emissions (in tons). Such estimates should be provided as an indication of total project construction impacts on air quality. 51-21

Pages 2-6, Table 1

The equipment list used as the basis for estimating construction emissions appears to be incomplete. The problems with the list include, but are not limited to, the following: 1) A single bulldozer is inadequate for grading 2.5 to 3.0 miles per day; 2) 2.5 to 3.0 miles of pipe per day would require about twice as many welding rigs as the six assumed; 3) Trucks on which the welding rigs are mounted are not but should be included; 4) A crane for unloading pipe should also be included; 5) Three stringing trucks are inadequate for the rural area construction; 6) Additional cranes would be required for the urban area construction; 7) Additional dump trucks would be required. Given these problems, it is clear that the equipment data should be revised to reflect a realistic equipment inventory since these data are crucial to determining construction emissions. 51-22

Page 8, Paragraph 1

How were these assumptions determined? The DEIS/R does not identify designated storage areas at 10 mile intervals. Are there landfills available at 15 mile intervals? 51-23

Page 8, C. Air Emissions Calculations, On-Site Emissions, Construction Equipment

The emission factors should be listed to enable the reviewer to check the calculations. 51-24

Control factors are given for catalytic and diesel engines but no indication is given as to which pollutants are governed by this factor. This information should be provided to check the appropriateness of the calculations. 51-25

Page 9, C. Air Emissions Calculations, On-Site Emissions, Fugitive Dust, Rural Fugitive Dust Emissions

The assumed corridor of 22 feet appears too narrow for the pipeline project. Justification for this assumption should be provided since it bears directly on fugitive dust estimates. Will no traffic occur on the remaining 48 feet of the pipeline corridor? Is a 2.5 mile per day rate of grading realistic? What was the right-of-way width of disturbance and rate of progress for AAPL or Mojave Pipelines? 51-26

A two foot wide trench is not realistic if the pipeline is 20 inches and the insulation is four inches. What is the true width of the trench? 51-27

RESPONSE TO LETTER 51:

51-19 It is not necessary to know the number of intersection to be trenched. This has been taken into consideration in the estimation of construction rates.

51-20 Emission factor calculations are presented in the report under the Air Emissions Calculations section (page 8).

51-21 Quantities of emissions in tons have been included in Table 2 which lists total emissions in lbs/day.

51-22 The construction rates have been corrected. The construction equipment proposed is on the basis of previous pipeline construction experience.

51-23 These assumptions would require storage areas at 20 mile intervals. This would require two storage areas in the desert areas. It is assumed one would be at 12-Gauge, another at Adelanto. Another storage area would be required to serve the Cajon Pass area. Four storage areas would be located in the urban areas. It is assumed greater flexibility would be available in locations of vacant lots and industrial storage areas. The distance traveled to landfills has been revised to 30 miles.

51-24 Refer to response to Comment 51-20.

51-25 Control factors have been provided.

51-26 Not the entire 70 feet width would be graded though the 70 feet width would be cleared of vegetation. However, to provide a more conservative estimate of fugitive dust the entire width of 70 feet has been used and the calculations revised.

51-27 The trench width is 3 to 4 feet. These calculations have been revised based on a width of 4 feet.

COMMENT LETTER 51:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 27, 1993

With respect to pipe welding and laying, the text states that there will be "no dust generated." Won't there be dust associated with movement along the right-of-way by trucks, side booms and other equipment? 51-28

Given that the trench is likely to be wider than the assumed 2 feet, the backfilling calculations need to be corrected. 51-29

Page 10, Total for Rural Fugitive Dust Emissions

The total does not account for all traffic on the right-of-way, total area of disturbance and total width of trench. 51-30

Page 10, Air Emissions Calculations, On-Site Emissions, Fugitive Dust, Urban Fugitive Dust Calculations

Would the 22 foot corridor assumed for grading occur throughout the urban area? Wouldn't part of the right-of-way be over paved surfaces? 51-31

As stated above, a 2 foot wide trench appears to be an incorrect and infeasible assumption. Additionally, as indicated above, the volume of trench material needs to be corrected given that the trench must be wider than 2 feet. 51-32

Pages 14-15, Total Project Days

The assumptions in this section appear to be overly optimistic and do not correspond to the information provided in the DEIS/R. Page 3-25, Paragraph 5 of the DEIS/R states that construction would proceed at 0.25 miles per spread per day in urban areas, and 1.5 miles per day in rural areas. Page 3-25, Paragraph 6 indicates that construction will be from 6:00 a.m. to 5:00 p.m. weekdays (11 hours) and 8:00 a.m. to 6:00 p.m. Saturday and Sunday (10 hours). The transportation section makes additional allowances for off-peak hour construction in urban areas. Based on trenching estimates of 1,000 feet per day per spread, it is impossible to complete 2.5 miles per day of pipeline. It would thus be impossible to complete the rural construction in 26 days. Given these inconsistencies in assumptions, and the lack of a credible schedule, it is clear that the analysis is flawed and should be redone. 51-33

Page 15, Paragraph 2, Pipeline Operation

The document fails to calculate indirect emissions associated with shipping 180,000 bpd crude oil 387 miles. Pumping and heating of crude oil for this distance would require extensive power requirements. 51-34

The document also fails to calculate fugitive emissions from the 750,000 barrel tank farm at the Cajon Terminal. 51-35

RESPONSE TO LETTER 51:

51-28 This movement is taken into consideration in construction equipment on-site emissions.

51-29 Refer to response to Comment 51-27.

51-30 Refer to responses to Comments 51-17, 51-26, and 51-27.

51-31 A width of 22 feet has been assumed for work areas in urban areas from M.P. 90 to M.P. 123. The pavement cut would be the ditch or bell hole width.

51-32 Refer to response to Comment 51-27.

51-33 Refer to response to Comment 51-18.

51-34 The AAPL though connected is a separate facility from the Cajon Pipeline. Refer to response to Comment 35-217.

51-35 Tank farm emissions have been included in the technical report.

COMMENT LETTER 51:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlainz
January 27, 1993

Appendix III. Cultural Resources Report

Cultural Resources Investigations, Site Inventory, and Evaluations, The Cajon Pipeline Project Corridor, Los Angeles and San Bernardino Counties, California. Prepared by McKenzie et al. November 12, 1992.

Page 35, Paragraph 1; Page 38, Paragraph 6; and Page 39, Top of Page - Paragraph 2

The various widths of survey for both BLM and Forest Service lands, and the number of people doing the survey, is very confusing. What were the survey widths and personnel requirements for each pipeline segment? Please provide more detail on the BLM A.P.E. of 120 feet and the Forest Service 500 feet: What were the selection criteria for different widths of survey? Was 500 feet actually used on Forest Service land? 51-36

Page 36, Archaeological Records Checks

The pipeline routes evaluated in the records check are not identified. Moreover, maps should be included to clearly identify the routes. Figure 1 (at Page 1) is too small of a scale, and no other route maps are provided. Based on the text, it appears that not all the alternatives were studied. Is that true? Were any of the Ontario to Carson and Hynes areas studied? 51-37

Page 39, First Full Paragraph

Why was the Mojave Pipeline right-of-way portion of the Kramer North alternative not studied? Would the A.P.E. correspond exactly to the existing Mojave Pipeline right-of-way? Did the Mojave Project have any cultural resource sites? How were the impacts for Mojave mitigated? 51-38

Page 39, Second Full Paragraph, Archaeological Field Investigations

What is meant by "long expanses in Los Angeles County were NOT conducive to survey?" If the route supposedly follows flood control channels for about 35 miles, why were the channels not surveyed? Why were the creeks, rivers, and waterways not considered as places for prehistoric and historic inhabitation? 51-39

Pages 59-61, Results of Investigations

The report identifies site number CA-LAN-967 as a site that may be impacted, but indicates that there is information leading to the conclusion that the site is likely destroyed. However, no information is presented to support the conclusion that the site was actually destroyed. The recommendations for the site are not specific; preconstruction investigations or at least construction monitoring should have been recommended.

The text of the DEIS/R fails to, but should, mention site number CA-LAN-967. The area should be identified as sensitive and a professional archaeologist should monitor the construction of the pipeline through this area. 51-40

Page 60

While the report identifies site CA-LAN-1046 as containing potential burials, the DEIS/R does not identify this potential.

The report does not accurately describe what California and Federal laws require in the event that burials are encountered. The U.S. Department of Interior's policy, as stated its policy in a Solicitor's 51-41

RESPONSE TO LETTER 51:

51-36 The corridor widths were as specified by BLM and USFS personnel. Barriers along the route will confine construction and in these instances the survey width was lessened.

51-37 Records checks were completed for all alternatives. Route maps were not distributed with the public copies of the Technical Appendices due to the sensitivity of the information enclosed, but are available for review at the BLM office.

51-38 The area of potential effect of the Mojave Pipeline would be the same as for the Cajon Pipeline.

51-39 The majority of the pipeline route from M.P. 74 south is covered by asphalt in road rights-of-way and therefore is not conducive to be surveyed.

51-40 This site is considered ineligible as it is believed to be destroyed with no remains visible from that reported in 1978 and is outside of the APE.

51-41 More detailed information on each cultural site has been included in the text of the Final EIS/EIR in response to other commentors.

COMMENT LETTER 51:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 27, 1993

Opinion, is that any area which has the potential for burials must be considered as an adverse impact and significant. 51-41

Pages 69, 70, 71, and 86

The report appears to concentrate on historic resources and gives inadequate consideration to prehistoric resources. Much time and space is given to discrediting previous surveys for recorded sites. The narrative assumes that sites CA-SBR-7085 (see p. 69), CA-SBR-7087 (see p. 70), CA-SBR-7088 (see p. 71), and CA-SBR-291081 (see p. 86) were not present and then were summarily dismissed as being ineligible. Inadequate support was presented to substantiate ineligibility, and in some instances previously identified lithics were now considered natural. Did Hampson et al. misidentify a number of sites? 51-42

General Comments

The data presented in the report do not meet BLM requirements for cultural resource inventories. The report is not represented as either a Class I or Class III inventory as required for major undertakings. Generally, all projects for which BLM requires an EIS are considered major undertakings. Previous EISs prepared by third party consultants where BLM is the lead agency for similar oil or gas pipelines projects have Class I and Class III Cultural Resource Inventories as baseline information prior to the distribution of a Draft EIS. An example is the EIS recently completed for the natural gas pipeline from Broomfield, New Mexico to Meeker, Colorado. The criteria for Class I Inventory is found in BLM Manual 8111.13 and for a Class II 8111.15.

It is clear that the report does not contain all the elements of a Class I inventory as required by BLM Manual 8111.13. It is also clear that the report did not adequately meet the requirements for a Class III Intensive Field Inventory. In particular a map at an appropriate scale showing the survey area and any discovered cultural properties should have been included. 51-43

There is information contained in the DEIS/R that is not presented in the cultural resource report. Examples of information not included in the report include: 1) the statement in the DEIS/R at Page 4.11-5 that there is a belief that there are sites buried along many of the water courses through the San Gabriel Valley; 2) the statement in the DEIS/R at Page 4.11-5, last paragraph, that "in addition to shallow surface deposits, areas within San Bernardino county are known to reflect a high probability for buried deposits"; 3) the statement in the DEIS/R at Page 4.11-6, first paragraph, that private properties or fenced parcels were not investigated; and 4) the reference in the DEIS/R at Page 5.11-1, to a programmatic agreement. 51-44

Appendix IV. Paleontological Report

Paleontological Studies, I. Literature Review/Paleontologic Site Records
Page 4, Location and Extent of Study

A study area map should be included to allow a comparison between the alignment for the paleontologic study indicated in the report and the route described in the DEIS/R. Were the routes identical? Why weren't all the alternatives studied? 51-45

Page 6, High Potential, Low Potential

The definitions of "high potential" and "low potential" are not clear. These definitions could be interpreted as indicating that any sedimentary unit has a high potential for significant paleontologic resources. 51-46

RESPONSE TO LETTER 51:

51-42 A number of the lithic scatters which have previously been identified were not found to the same extent or were found to be of no depth and were therefore considered ineligible.

51-43 The cultural resources survey was undertaken to BLM requirements.

51-44 A general overview of the cultural resources of the region are provided in the Draft EIS/EIR. Additional information may be provided from other sources and is not based on the technical report alone. The Cultural Resources technical report provides detailed information on the cultural resources survey undertaken for the Cajon Pipeline itself.

51-45 Refer to response to Comment 51-37.

51-46 Yes, all sedimentary units within this region have a high potential for paleontological resources.

COMMENT LETTER 51:
PACIFIC PIPELINE SYSTEM, INC.

Mr. Stephen Johnson
Ms. Pat Chamberlaine
January 27, 1993

Page 9, Table Summary of Literature Review, Cajon Pipeline, California

Based on the features described, the alternate route designated on this table appears to be the DEIS/R proposed route. The information in the table also does not agree with information presented in the DEIS/R. For example, the table lists MP 10-12.5 on the Alternate Route as low potential with granitic rock units present; DEIS/R Map 18 of 26 indicates MP 10 as high potential with Quaternary Alluvium present, not granitic units. The table lists MP 50.0-51.1 as low potential with granitic units present; DEIS/R Map 8 of 26 indicates that area as high potential with Quaternary Alluvium present, not granitic units. Table 4.11.1-2 (at Page 4.11-9 of the DEIS/R) appears to provide information that is different from the information presented in the Table Summary. 51-47

Page 23, Number 6, Milepost 50.0-51.1

The discussion designates MP 50.0 as low potential. This conflicts with Map 8 (included in the DEIS/R as Appendix A and included in the Technical Appendices at Appendix I.F.) which lists Quaternary Alluvium (Qal) rock units near MP 50 with a high potential for paleontological resources. The overall inconsistencies raise questions on the accuracy of the paleontological assessment in the DEIS/R. 51-48

Sincerely,
PACIFIC PIPELINE SYSTEM, INC.

Morrison L. Rooney
President

RESPONSE TO LETTER 51:

51-47 As stated in section 3.3 subheading 3.3.2, the original proposed route (Cajon Pipeline Route) became the alternate route for purposes of environmental comparison and was named the Kramer Segment Alternative. The Technical Reports were done prior to the subsequent reconfiguration. However, this does not change the accuracy of the information contained in the reports.

51-48 Refer to response to comment 51-47.

5.0

Verbal Testimony Transcripts and Responses

5. VERBAL TESTIMONY AND RESPONSES

5.1 INTRODUCTION

This chapter presents all verbal testimony received at three public hearings held along the pipeline route in December, 1992. Public hearings were held at Pomona, Carson and Adelanto on December 1, 2, and 3 respectively. Testimony provided at these hearings was recorded by a court reporter. The transcription of this testimony is included in the following pages. Specific responses to each comment are presented in this chapter. The Draft EIS/EIR text has been revised where appropriate resulting in an inclusive Final EIS/EIR. Specific sections of the Final EIS/EIR which were modified in response to comments, are cited in the specific response to assist commentors with their review of specific concerns.

PUBLIC HEARING:
DECEMBER 1, 1992, POMONA
POMONA CITY COUNCIL CHAMBERS

PUBLIC HEARING 1:

PUBLIC HEARING

CAJON PIPELINE

Tuesday, December 1, 1992

Pomona City Council Chambers

The public hearing concerning the proposed Cajon Pipeline was started at 7:00 p.m. by the Hearing Officer, Stephen Johnson of the Department of Interior, Bureau of Land Management.

After being introduced by the Hearing Officer, Ross Geller of EIP gave a brief background of the project.

A slide presentation was then shown and narrated by Bronwyn Buntine, also of EIP. The slides depicted the route of the proposed pipeline from Twelve Gauge Lakes to the GATX Terminal in Carson.

Thereupon the Hearing Officer opened the hearing to give those attending an opportunity to speak.

HEARING OFFICER JOHNSON: Thank you, Bronwyn and Ross. As I said earlier, the purpose of this meeting tonight is for -- to provide a forum for public comment. Presently, I have two people who have registered, and neither wish -- indicated that they wish to make any comments. Is there anyone here that has not registered or would wish to make a comment tonight on this project?

Not hearing anyone -- Yes. Please state your name for our court reporter.

ROBERT MC CONE: My name is Robert McCone. I'm the

PUBLIC HEARING:
DECEMBER 1, 1992, POMONA
POMONA CITY COUNCIL CHAMBERS

Assistant Planner, City of Pomona. I just had some comments, or some, rather, also questions regarding the pipeline. I would request that further explanation be addressed on the mitigation measures, as far as the aesthetic impacts of the pipeline itself, and the construction activities in areas accessible to the public, or areas even partially devoted to public uses. PH1-1

Further discussion with mitigation measures are requested for any potential explosions, ruptures, and leakage resulting from seismic occurrences, train derailments, or other causes.

An analysis should be provided which includes an assessment of the likelihood and type of pipeline related accidents which might reasonably be expected to occur in Pomona in a worst-case scenario, and the impact which such an incident would have on our emergency services. PH1-2

Will there be a regular and thorough maintenance program, and if so, how is it conducted. PH1-3 Proposed pipeline will cross the Chino Fault line and further information is required discussing any seismically induced accidents along the mitigation -- along with the mitigation measures concerning construction of the pipeline and safety procedures. PH1-4

And concerning noise, mitigation measures should be addressed concerning the noise created during construction near the locations which were noted in the EIR or EIS rather, such as the catholic girls school, trailer park, and so on. It's all stated in the document. PH1-5

Furthermore, a public use permit would be required by the planning commission by the City of Pomona. And -- the following existing transportation facilites may result in PH1-6

PUBLIC HEARING 1:

PH1-1 There will be no above ground facilities within the City of Pomona. Above ground facilities are located at 12-Gauge Lake and the City of Adelanto. A pressure reduction station will be located at M.P. 73.0. Right-of-way markers are required by federal regulations. Aesthetic impacts of these facilities are addressed in response to concerns raised by the City of Paramount. Please refer to response to Letter 13.

PH1-2 The concerns of the City of Pomona regarding explosion and safety hazards are addressed in response to the City of Ontario's concerns regarding public safety. Refer to the response to Letter 18.

PH1-3 A regular and thorough maintenance program will be required. Maintenance procedures are addressed in Chapter 3 of the Final EIS/EIR.

PH1-4 Information pertaining to the Chino Fault has been included within the Final EIS/EIR. Mitigation measures for seismic activity have been addressed through engineering design requirements. Please refer to Mitigation Measure 5.1.1-1.

PH1-5 An additional mitigation measure for notification of construction activity has been included within the document. Please refer to Mitigation Measure 5.5.1-2.

PH1-6 The City of Pomona is listed as a permitting agency in Table 1-2 of the Final EIS/EIR. Mitigation measures are listed for transportation impacts in Section 5.10.

PUBLIC HEARING:
DECEMBER 1, 1992, POMONA
POMONA CITY COUNCIL CHAMBERS

interruption to the traffic flow and mitigation measures should be addressed. PH1-6

DENNIS MACKAY: One additional comment. I'm Dennis Mackay, City Planner, City of Pomona. The pipeline is proposed to travel along the south side of the Southern Pacific Railroad line. We have a proposed future commuter rail stop planned along the south side of those railroad tracks, and we want to make sure that there's no conflict of the scheduling of the construction schedules between those two projects. The future commuter rail stop is part of a Metro Link light rail system, and it's an important project to the City of Pomona. PH1-7

That's all that I have.

HEARING OFFICER JOHNSON: Thank you.

ROSS GELLER: Excuse me. Can we get just get clarification on the first point that was raised relative to aesthetics?

HEARING OFFICER JOHNSON: Yes.

ROSS GELLER: What specifically the Assistant Planner was discussing.

ROBERT MC CONE: Well, the aesthetics concerning the pipeline could range from a proper screening methods during construction if -- as deemed necessary by the City Planner, and I wasn't quite sure if the pipeline is going to be completely underground along the route of Pomona, throughout its route through Pomona, and if it wasn't are there screening methods through vegetation or other means. PH1-8

HEARING OFFICER JOHNSON: It will be underground.

ROSS GELLER: Totally.

HEARING OFFICER JOHNSON: Thank you. Yes?

PUBLIC HEARING 1:

PH1-7 Comment noted. The Cajon Pipeline Company will coordinate with the City of Pomona prior to final design to avoid conflict of utilities and planned projects. An additional mitigation measure has been added to ensure that conflicts of utilities and planned projects do not occur. Please refer to Mitigation Measure 5.8.1-1(b).

PH1-8 Refer to response to Comment PH1-1.

ELLIOTT ELLSWORTH: My name is Elliott Ellsworth. I'm the Associate Planner for the City of Ontario. I'm also a resident of Ontario. My comment tonight is, basically, a question in terms of alternatives that were considered through Ontario. They were presented on an exhibit, but I didn't see any analysis of the alternatives. Basically why they were not considered for routing, these other two alternatives? PH1-9

The second comment I have is the question -- again, is the Cajon Pipeline route the preferred environmental alternative, or is this a solution to get around public controversy? It appears that there's shorter pipeline alternatives that could have been used; the Pacific Pipeline route, and the Angelus Pipeline route, and those would be shorter if those routes would have used the new pipeline that's proposed to be used for the Cajon Pipeline. The system liability would have been the same, and the impacts on the environment would have been the same. And those are much shorter, much more direct routes to the GATX Terminal. And my question is, basically, is this just a way to avoid controversy in areas that you've seen controversy before and -- or is this actually the best environmental solution? Is this much longer route, exposes much more land to potential for ruptures, leakage, explosion, is this the -- is the evidence in the Draft EIR and ultimately the Final EIR, EIS justify this pipeline routing? PH1-10

That's all I have.

HEARING OFFICER JOHNSON: Okay. Thank you, Mr. Ellsworth. Is there anyone else at this time that would like to provide comments? Not hearing anyone, I appreciate your input on this.

PUBLIC HEARING 1:

PH1-9 The alternatives shown in Figure 3-1 are alternatives that were considered but eliminated from detailed analysis due to preliminary review of environmental impacts. Refer to Section 3.3.5 of the Final EIS/EIR.

PH1-10 The Cajon Pipeline is shorter than the Pacific Pipeline route. The comparisons of the different alternatives available is presented in Section 6 of the Final EIS/EIR.

These comments have been duly noted by our court reporter. They will be addressed in the -- included and addressed in the final Environmental Impact Report, Environmental Impact Statement with responses to these concerns, issues that you have risen tonight.

We appreciate you taking the time to come to provide input in the process to provide us this feedback so that we can hopefully, produce a document that is a quality document but will fulfill -- besides more than fulfill, just the nature of the environmental law, but the spirit of full disclosure and understanding of exactly what the Cajon project is.

So, with that, thank you very much for coming.

Thereupon the public hearing concerning the Cajon Pipeline project held at the City of Pomona Council chambers, was adjourned at 7:20 p.m.

PUBLIC HEARING:
DECEMBER 2, 1992, CARSON

PUBLIC HEARING 2:

PUBLIC HEARING

CAJON PIPELINE

Wednesday, December 2, 1992

Carson Community Center

The public hearing concerning the proposed Cajon Pipeline was started at 7:05 p.m. by the Hearing Officer, Stephen Johnson of the Department of Interior, Bureau of Land Management.

After being introduced by the Hearing Officer, Ross Geller of EIP gave a brief background of the project.

A slide presentation was then shown and narrated by Bronwyn Buntine, also of EIP. The slides depicted the route of the proposed pipeline from Twelve Gauge Lake to the GATX Terminal in Carson.

Thereupon the Hearing Officer opened the hearing to give those in attendance an opportunity to speak.

HEARING OFFICER JOHNSON: Thank you, Bronwyn, Ross, for your presentation on this. Tonight, as the Hearing Officer for this hearing, we are providing you the opportunity to speak to us about any of your concerns, thoughts, comments that you may have on the draft document. We have a court recorder tonight, Ruth Goodin, who will be taking down all that transpires here. It will be transcribed and it will be included in the Final Environmental Impact Statement, Environmental Impact Report.

Any questions that are raised tonight will be included in that as well, and if you do not have comments tonight but wish

PUBLIC HEARING:
DECEMBER 2, 1992, CARSON

to provide comments, you have until January 5th, as noted in the document, to send to me your comments. So, there is a continuing opportunity.

With that, I would like to go ahead and open the hearing. Tom Rooney, Pacific Pipeline, would you care to come forward and speak at this time.

TOM ROONEY: My name is Tom Rooney, and I represent Pacific Pipeline System, Incorporated. I'm going to read this because I haven't got it all memorized, and I'll let you take it down.

We are currently reviewing the Cajon Draft EIR in detail, and will be submitting written comments at a later date. As a preliminary matter, however, we would like to register our concern regarding two components of the Draft EIR, the Environmental Impact Analysis, the Alternatives Analysis.

First, we believe that the Impacts Analysis falls short of what is required under CEQA because it does not identify applicable standards of significance; presents inadequate quantitative and qualitative data in support of the significance inclusions; and fails to satisfy the data requirements of other permitting and reviewing agencies. PH2-1

Second, we believe that the Alternatives Analysis also falls short of what is required under CEQA. The information regarding the Pacific Pipeline project is also inadequate -- inaccurate, excuse me. PH2-2

As I said earlier, we will be providing more specific written comments on the Cajon Draft EIR later this month. Thank you very much.

HEARING OFFICER JOHNSON: Thank you, Mr. Rooney. Of the

PUBLIC HEARING 2:

PH2-1 The comments raised by Mr. Rooney are addressed specifically in the letter received from the Pacific Pipeline Company on January 4, 1993. Please refer to Letter 35.

PH2-2 Property owners will be notified if there is any intent to secure easements on privately held property. At this time the pipeline is not approved and may or may not be constructed.

registration cards that I've received, Mr. Rooney is the only one that indicated that he wishes to speak at this meeting tonight. However, I would be willing to entertain anyone else that would like to provide input at this time.

AUDIENCE MEMBER: Are you prepared to answer questions regarding the pipeline; purpose and need and things like that?

HEARING OFFICER JOHNSON: As far as the purpose of this meeting, no, we are not. After the meeting is over, I am sure there will be people here who will be happy to sit and talk with you, but right now, we're not in the process of answering questions. We're taking your questions and concerns, recording those, and those will be addressed in the final Environmental document.

Yes, ma'am?

PILAR PERRY: I have a question. My name is Pilar Perry of Watson Land Company. Have the property owners been notified; property owners affected by the proposed route, been notified that their property is going to be affected? PH2-3

HEARING OFFICER JOHNSON: Well, as I said, we aren't really going to address a lot of questions per se, but to give you some idea of where we stand in the process, no final decision or even a real preliminary decision has been made to approve or disapprove this project. Either --

PILAR PERRY: But does the proposed route -- I guess you can't answer my question.

Let me just state for the record then that Watson Land Company appears to be significantly impacted in terms of going through its properties, yet, we have never received any kind of PH2-4

PUBLIC HEARING 2:

PH2-3 Public notification was undertaken in three newspapers as required by the California Environmental Quality Act and the Bureau of Land Management Guidelines to NEPA.

PH2-4 Comment noted.

notification about this project. It is just by chance that we found out that this was even going to take place tonight.

So, there's grave concern here that appears the proposed route is going through a significant portion of our property; that we had no idea. I'd like to know where the information is that we could review and specific comments. PH2-4

HEARING OFFICER JOHNSON: We'd be happy to provide you -- If you'd fill out one of the registration cards for us -- be happy to provide you a copy of the Draft Environmental Impact Statement for your use and review.

Is there anyone else? Not hearing anyone, I thank you for coming out tonight. We had a fairly quiet meeting which somewhat surprises me, but it's pleasant as the hearing officer to have one of those occasionally. Thank you for coming, and I know the representatives of Cajon as well as our environmental contractor, yours truly, would be happy to talk with you about anything that you might want to talk about. It will not be included in the record and so therefore it will not be addressed except for our own discussions here. Thank you.

Thereupon this public hearing concerning the Cajon Pipeline project held at the Carson Community Center was adjourned at 7:20 p.m.

PUBLIC HEARING:
DECEMBER 3, 1992, ADELANTO

PUBLIC HEARING 3:

PUBLIC HEARING

CAJON PIPELINE

Thursday, December 3, 1992

Adelanto City Council Chambers

The public hearing concerning the proposed Cajon Pipeline was started at 7:12 p.m. by the Hearing Officer, Stephen Johnson of the Department of Interior, Bureau of Land Management.

After being introduced by the Hearing Officer, Ross Geller of EIP gave a brief background of the project.

A slide presentation was then shown and narrated by Bronwyn Buntine, also of EIP. The slides depicted the route of the proposed pipeline from Twelve Gauge Lake to the GATX Terminal in Carson.

Thereupon the Hearing Officer opened the hearing to give those in attendance an opportunity to speak.

HEARING OFFICER JOHNSON: Thank you, Ross, Bronwyn. Gives you a pretty good overview of what this project is all about. Tonight my function here is as Hearing Officer for this hearing. We'll be receiving your testimony, questions, or anything that you have that you wish to provide to us. However, the purpose of this meeting is to receive. We're not going to attempt to address questions. As I said, they will be included and addressed -- anything that you provide us will be addressed in the final Environmental Impact Statement which will be prepared after the close of the comment period. In light of the number

PUBLIC HEARING:
DECEMBER 3, 1992, ADELANTO

of people here tonight,
I will not impose a time limit on speakers, and we'll start with Carolyn McNamara.

CAROLYN K. MC NAMARA: Probably one of the -- This isn't even on, is it. The reasons you probably don't have that many people here is 'cause probably no one knows. I just found out about this the day before yesterday, and that was only because it was in the Hesperia Reporter. It wasn't in the Daily Press. They didn't even know about it. I had to call them today. PH3-1

What I wanted to know is why weren't people in the Baldy Mesa area notified about this project? This is the first I've heard about it. Were they notified by mail or anything?

HEARING OFFICER JOHNSON: Ms. McNamara, as I said I'm not here -- we're not here to answer your questions. We're here to make notations of your questions.

CAROLYN K. MC NAMARA: Okay. Another question I have is why this route? Does it have to cross Victor Valley? If you draw a straight line from point A to point B, that would be through the Palmdale area. It wouldn't even be touching Victor Valley. PH3-2

My other question is why Baldy Mesa Road, and, again, why weren't the people notified? On Baldy Mesa Road there's a natural gas line running down Baldy Mesa Road on both sides. You also have an elementary school. This is earthquake territory. We just experienced one about an hour and 20 minutes ago. If there was to be an earthquake, and there was to be a crack in the pipeline or the gas line, what would the damages be to the environment and the community? And what would be the damage to the elementary school, and do we have a say in this? That's PH3-3

PUBLIC HEARING 3:

PH3-1 Public notification was undertaken in three newspapers as required by the California Environmental Quality Act and the Bureau of Land Management Guidelines to NEPA.

PH3-2 The proposed pipeline route was selected after reviewing a number of different alternatives to meet the same objective. If a connection was made to the Palmdale area, a crossing of the San Gabriel Mountains would still be required. The possible crossing locations which afford the greatest constructability are through either the Cajon Pass or the Tejon Pass, not directly across the mountainous areas. Both of these alternatives have been assessed in this EIS/EIR.

PH3-3 The pipeline will be engineered to reduce the potential risk of rupture from seismic activity. The pipeline has been rerouted around the Baldy Mesa Elementary School in response to public concerns.

what I want to know. Thank you. PH3-3

HEARING OFFICER JOHNSON: Thank you. Our next speaker is Linda Elkins.

LINDA ELKINS: I'm really not prepared to talk tonight. I've been wading through the document, and I do have a few thoughts. But I'm also going to be writing them later. I, too, am concerned about the public notification of this. I have been watching diligently, not only the Daily Press, but our Mountaineer Progress which is published in Phelan. PH3-4

I represent a homeowners' association that borders Baldy Mesa Road, and as far as I know, none of our members knew about this until I put out a newsletter trying to summarize the summary that was in the first part of your Environmental Report. And I don't know if there's any responses yet because it's come at such a rapid clip at the holiday time.

I am concerned about the school. I am very concerned about the potential danger for earthquake. We're all aware that the possibility of the big one has been upgraded recently, substantially. I'm not sure of all my facts and figures, but I will write them to you. The damage that was done out in the Landers area for a previously unknown earthquake fault, and when it ruptured, the damage that was done to the water storage tank out there, I can imagine what could be done to the oil storage tanks at Twelve Gauge Lakes. (sic) PH3-5

I've read about your proposal to contain any spill out there and yet if there was any unknown fault that should rupture in that area, it would also damage your containment arrangements, and I wonder about that. I know that you have provided stops

PUBLIC HEARING 3:

PH3-4 Public notification is addressed in response to comment PH3-1.

PH3-5 Engineering design is undertaken in a conservative way. The mitigation measure proposed to reduce the pipeline breakage is recommended to reduce the risk of pipeline rupture. Similarly design of tank containment structures will incorporate conservative estimates for seismic events. Containment is provided for 125 percent of tank volume. In the event of a major rupture, if a failure occurred within the containment berm, containment maybe reduced but would not be anticipate to be totally lost. An emergency backup power supply will be available in the event of power failure.

along the way in the pipeline, valves that shut the pipeline down so the leakage would be minimal. However, with a substantial earthquake we're going to lose our electric power up here, and I imagine that a lot of that is not manually operated. That somehow the signals are transmitted electrically, and you could have a disruption of your electric power. PH3-5

I think that's all I have to say right now, but you're going to be hearing from me. Thank you.

HEARING OFFICER JOHNSON: Thank you. Of the registration cards, these two ladies are the only two that I have noted that wish to speak. However, I would be happy to entertain statements, or questions, or comments from any of the rest of you at this time. Is anyone else -- wish to provide testimony. Not hearing anyone, I will then close this meeting.

We will be around here to talk with you. We have representatives of Cajon Pipeline. We have, fortunately tonight, we have Dee Dorval, from the City of Adelanto, and we would be happy to sit around and talk about anything you would like.

Thank you all for coming. We appreciate you taking the time to come and be with us tonight for this purpose of this hearing. All of you who have provided -- who either received the Draft Environmental Impact Statement or provided comments, will be receiving copies of the final document as well. Thank you.

Thereupon this public hearing concerning the Cajon Pipeline Project held at the Adelanto City Council Chambers, was adjourned at 7:30 p.m.

6.0 Acronyms and Abbreviations

6. ACRONYMS AND ABBREVIATIONS

AAPL	- All American Pipeline
ADT	- Average Daily Traffic
APCD	- Air Pollution Control District
API	- American Petroleum Institute
AQAP	- Air Quality Attainment Plan
AQMP	- Air Quality Management Plan
ARB	- Air Resources Board
AT&SF RR	- Atchison Topeka & Santa Fe Railroad
BACT	- Best Available Control Technology
bbls	- barrels
BHP	- brake horse power
BLM	- U.S. Department of Interior, Bureau of Land Management
BPD	- barrels per day
BTC	- City of Los Angeles Board of Transportation Commissioners
BTU	- British thermal unit
Btu/hr	- British thermal units per hour
CA-126	- California State Route 126
CAAQS	- California Ambient Air Quality Standards
CARB	- California Air Resources Board
CCAA	- California Clean Air Act
CDCA	- California Desert Conservation Area
CDFG	- California Department of Fish and Game
CDMG	- California Division of Mines and Geology
CEQA	- California Environmental Quality Act
CFR	- Code of Federal Regulations
cfs	- cubic feet per second
CNDDB	- California Natural Diversity Data Base
CNEL	- Community Noise Equivalent Level
CNPS	- California Native Plant Society
CO	- carbon monoxide
COM Plan	- Construction/Operation/Maintenance Plan
dBA	- decibels A-weighted
DHS	- California Department of Health Services
DOT	- (U.S.) Department of Transportation

DWR	- Department of Water Resources
EIR	- Environmental Impact Report
EIS	- Environmental Impact Statement
EPA	- Environmental Protection Agency
ERT	- Emergency Response Team
EVC	- existing visual conditions
F	- Fahrenheit
ft	- feet
GPD	- gallons per day
H_2S	- hydrogen sulfide
hp	- horsepower
I-5	- Interstate 5
I-15	- Interstate 15
I-710	- Interstate 710 (Long Beach Freeway)
I&M	- Inspection and Maintenance
KCAPCD	- Kern County Air Pollution Control District
LACFCD	- Los Angeles County Flood Control District
LACDPW	- Los Angeles County Department of Public Works
LADWP	- Los Angeles City Department of Water and Power
LA SLRR	- Los Angeles and Salt Lake Railroad
lb/day	- pounds per day
L_{dn}	- day-night (average sound) level
L_{eq}	- energy equivalent noise level
LOS	- level of service
M	- Magnitude (earthquake)
MGD	- Million gallons per day
mg/l	- milligrams per liter
mg/m^3	- miligrams per cubic meter
MP	- Milepost
MSA	- Metropolitan Statistical Area
M-70	- Mobil Line 70
NAAQS	- National Ambient Air Quality Standards
ND	- Negative Declaration
NEPA	- National Environmental Policy Act
NOI	- Notice of Intent
NOP	- Notice of Preparation
NO_x	- nitrogen oxides
NPDES	- National Pollution Discharge Elimination System
NSR	- New Source Review
O_3	- ozone

OPR	- Office of Planning and Research
OPSO	- Office of Pipeline Safety and Operations
OSHA	- Occupational Safety and Health Administration
OSC	- Oil Spill Contingency (Plan)
PACTEX	- Pacific-Texas Pipeline Project
Pb	- lead
PCE	- passenger car equivalency
PM_{10}	- particulate matter less than 10 microns in diameter
ppm	- parts per million
PSD	- prevention of significant deterioration requirements
psi	- pounds per square inch
psig	- pounds per square inch gauge
ROCs	- Reactive Organic Carbon
ROG	- Reactive Organic Gases
ROW	- right-of-way
RWQCB	- Regional Water Quality Control Board
SBCAPCD	- San Bernardino County Air Pollution Control District
SCAB	- South Coast Air Basin
SCADA	- Supervisory Control and Data Acquisition System
SCAG	- Southern California Association of Governments
SCAQMD	- Southern California Air Quality Management District
SCCAB	- South Central Coast Air Basin
SCE	- Southern California Edison
SCS	- Soil Conservation Service
SDAB	- Southeast Desert Air Basin
SEA	- Significant Ecological Area
SIP	- State Implementation Plan
SJV	- San Joaquin Valley
SJVAB	- San Joaquin Valley Air Basin
SO_2	- sulfur dioxide
SO_x	- sulfur oxides
SPRR	- Southern Pacific Railroad
sq. mi.	- square miles
SR	- State Route
TDS	- total dissolved solids
TSP	- total suspended particulates
TSS	- total suspended solids
UPRR	- Union Pacific Railroad
US-101	- U.S. Highway 101
USCG PIRS	- (p 6.11-6)

6. Acronyms and Abbreviations

USDA	- U.S. Department of Agriculture
USFS	- U.S. Forest Service
USFWS	- U.S. Fish and Wildlife Service
USGS	- U.S. Geologic Survey
VCAPCD	- Ventura County Air Pollution Control District
VRMS	- Visual Resource Management System
VQO	- visual quality objectives
VOCs	- Volatile Organic Compounds
$\mu g/m^3$	- micrograms per cubic meter